

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

FILED

OCT 10 2013

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, INC.

Plaintiff,

§ 40 v.

Civ. Action No.

CV 13 4725

NATIONAL LEAGUE OF LATIN
AMERICAN CITIZENS, BERNARDO EURESTE
Individually, ANGEL G. LUEVANO, Individually
ARGENTINA DAVILA-LUEVANO, Individually
And Jan B. TUCKER, Individually
Defendants.

JSC

PLAINTIFF'S ORIGINAL COMPLAINT

This is an action for trademark infringement and claims under CA Civil Code § 1572 Fraud, CA Civil Code §3336 Conversion of Property, Restatement of Torts § 682 Abuse of Process. Plaintiff, the League of United Latin American Citizens (hereinafter "LULAC"), files this Original Complaint seeking injunctive relief and damages against the National League of Latin American Citizens (hereinafter "NLLAC"), Bernardo Eureste, individually, Angel G. Luevano, individually, Argentina Davila-Luevano, individually, and Jan B. Tucker, individually.

Parties

1. Plaintiff LULAC is a Texas non-profit corporation with its principal place of business in most of the 50 states including California, the commonwealth of Puerto Rico and in the District of Columbia. Plaintiff LULAC was founded in Texas on February 17, 1929 and thereafter incorporated in Texas in 1931.

2. Defendant National League of Latin American Citizens (NLLAC) was incorporated under the laws of the state of Nevada, on August 1, 2011. Upon information and belief, Defendant NLLAC operates or purports to operate a non-profit advocacy

organization through membership recruitment, and by attempting to take members from Plaintiffs organization and by purporting to also be members of Plaintiff LULAC's California chapter / council organization. Defendants' have adopted a name similar to Plaintiff LULAC and adopted the slogan "continuing the legacy of 1929", to purposely cause confusion among persons who may be searching for Plaintiff LULAC, the oldest and largest Latino organization in the United States founded on February 17, 1929. Defendant NLLAC has adopted similar aspects of Plaintiff's Constitution and By-Laws as its own including its membership / council structure. Defendant NLLAC may be served with process by serving its registered agent for service of process, Bernardo Eureste at 9406 Sharpview Drive, Houston TX 77036.

3. Bernardo Eureste is an individual and former member of Plaintiff LULAC, who resides at 9406 Sharpview Drive, Houston, TX 77036.

4. Angel G. Luevano is an individual, former member of Plaintiff LULAC, who resides at 3001 Kodiak Street, Suite 120 , Antioch, CA. 94531.

5. Argentina Davila-Luevano is an individual, former member of Plaintiff LULAC, who resides at 3001 Kodiak Street, Suite 120 , Antioch, CA. 94531.

6. Jan B. Tucker is an individual, former member of Plaintiff LULAC, who resides at P.O. Box 433, Torrance, CA. 90508-0433.

Jurisdiction and Venue

6. This Complaint involves claims for trademark infringement arising under the trademark laws of the United States, Title 15, *United States Code* and related claims of unfair competition in violation of the *Lanham Act*, 15 U.S.C. §1125, common law trademark infringement and common law unfair competition. This Court has jurisdiction pursuant to the provisions of 28 U.S.C. §§1331 and 1338.

7. This complaint also involves claims under (CA Civil Code § 1572 Fraud, CA

Civil Code §3336 Conversion of Property, Restatement of Torts § 682 Abuse of Process).

8. Venue of this action in this Court and district is proper pursuant to the provisions of 28 U.S.C. § 1391(b), because some or all of the tortuous acts of trademark infringement and unfair competition have occurred in the State of California and/or have been directed at Plaintiff LULAC, a non-profit corporation doing business within this district and the State of California. Thus, this Court has personal jurisdiction over the Defendants.

In addition the events giving rise to tortuous infringement against Plaintiff LULAC occurred in this district, and all Defendants displayed and distributed the infringing items to the public in this district through email distribution, personal delivery and internet the blog Voice of the Mainland. Venue is further proper in this district pursuant to 28 U.S.C. §1391(b)(2).

Factual Background

9. Plaintiff LULAC is the largest and oldest Latino membership based organization in the United States. Plaintiff LULAC was founded in Texas in 1929 in Corpus Christi, Texas, and incorporated in the State of Texas in 1931. (Exhibit 1)

10. The *League of United Latin American Citizens* is the owner of a federal protected trademark issued by the United States Patent and Trademark office under serial number 78873526 filed on December 12, 2006 and issued registration number 3213141 on February 20, 2007. (Exhibit 2)

11. *LULAC* is the owner of a federal protected trademark issued by the by the United States Patent and Trademark office under serial number 78873950 filed on May 1, 2006 and issued registration number 3211325 on February 20, 2007. (Exhibit 3)



12. *LULAC* is the owner of a federal protected trademark issued by the by the United States Patent and Trademark office under serial number 78873962 filed on May 2, 2006 and issued registration number 3211326 on February 20, 2007. (Exhibit 4)

13. These marks as described in paragraphs 10, 11, 12 above are collectively referred to as the "LULAC Marks".

14. The individual Defendant's herein, without authority from Plaintiff LULAC incorporated Defendant NLLAC in the State of Nevada, as a separate entity from Plaintiff LULAC on August 1, 2011 as a non-profit corporation. (Exhibit 5)

15. Prior to their unauthorized action of incorporating NLLCA, Defendants Bernardo Euseste, was permanently removed as a member of Plaintiff LULAC at a special hearing of the National Board of Directors meeting in TEXAS on Oct. 2, 2011.

16. Prior to their unauthorized action of incorporating Defendant NLLAC, taking the office of California State Director of NLLAC, and continuing to hold himself out to the public as a member and officer of Plaintiff LULAC, Defendant Angel G. Luevano was permanently removed as a member of Plaintiff LULAC at a special hearing of the National Board of Directors, meeting in Washington, D.C. on February 12, 2011.

17. Prior to their unauthorized action of incorporating Defendant NLLAC, assisting her husband Angel with the promotion of NLLAC and continuing to hold herself out to the public as State Director of California LULAC, Defendant Argentina Davila-Luevano was permanently removed as a member of Plaintiff LULAC at a special hearing of the National Board of Directors, meeting in Washington, D.C. on February 12, 2011.

18. Prior to their unauthorized action of incorporating Defendant NLLAC and assisting Defendants' the Luevanos, Defendant Jan Tucker ceased being a member of Plaintiff LULAC.

19. Each individual Defendant, with the exception of Defendant Tucker, was removed from their state office or membership for separate and individual violations of the Plaintiff LULAC's constitution, protocol and by-laws.

20. After their unauthorized action in incorporating Defendant NLLAC and other acts as described above, the Defendant's the Luevano's and Jan B. Tucker sought intervention of the California state courts to overturn their removal as Plaintiff LULAC members or office holder. This intervention was publicly supported by Defendant Bernardo Eureste.

21. Prior to their unauthorized action in incorporating Defendant NLLAC and other acts as described above, the individual Defendants filed suit on September 1, 2011 in the Superior Court, Los Angeles County, CA under Cause No. 441643. The suit requested a Temporary Restraining Order, Temporary Injunction and Permanent Injunction against Plaintiff LULAC. After several hearings in this case, the Court dismissed their suit for (failure to follow court procedure and process, and failure to amend complaint to state a cause of action).

22. Since 1929, Plaintiff LULAC has spent an enormous amount of resources developing and marketing the Plaintiff LULAC organization. The public has come to recognize the distinctive "LULAC" name and "LULAC" Marks, and associates the name and marks with the Plaintiff herein. As a result, Plaintiff LULAC has developed a significant amount of goodwill in association with the use of the "LULAC" Marks and has established an excellent reputation regarding the quality of its advocacy in issues important to the Latino community. Plaintiff LULAC's reputation is known throughout California, the United States and Puerto Rico. Plaintiff LULAC is known for its advocacy in education, immigration, worker rights, civil rights,

and other issues important to the Latino community. Plaintiff LULAC asserts its advocacy by various means, including but not limited to civil rights, voter rights and other types of litigation.

23. The individual Defendants, without authorization from Plaintiff LULAC, has been using the “LULAC” Marks in its attempt to circumvent both the decision of the Plaintiff LULAC and its’ National Board of Directors as well as the Los Angeles County Superior Court of California which denied their attempts to overturn the decision of the Plaintiff LULAC. The individual Defendants have begun promoting the creation “NLLAC” and continue to hold themselves out as members of LULAC, California LULAC and continue to fraudulently raise money and advocate using the LULAC marks for their own personal gain. These Defendants promote themselves by means of electronic mail to the Plaintiff LULAC’s membership, personal handouts and through an internet blog, the “Voice of the Mainland.” (Exhibit 7 and 8)

24. Based on information and belief, Defendant NLLAC has begun marketing by using the slogan “continuing the legacy of 1929” and using a name strikingly similar to Plaintiff LULAC which could lead to confusion of the “LULAC” Marks. (Cite examples)

Count 1
Federal Trademark Infringement

25. The allegations set forth in Paragraphs 1 through 24 are incorporated by reference as if fully set forth herein.

26. Under the *Lanham Act*, 15 U.S.C. § 1057, Plaintiff LULAC’s registration of the “LULAC” Marks constitutes *prima facie* evidence of the validity of the “LULAC Marks,” of Plaintiff LULAC’s ownership of the “LULAC” Marks, and of Plaintiff LULAC’s exclusive right to use the “LULAC” Marks in connection with its non-profit advocacy organization and any legal use.

27. Defendant NLLCA use of the slogan “continuing the legacy of 1929” and the use of the name the National League of Latin American Citizens to identify its non-profit advocacy

services is likely to cause confusion, mistake or deception to consumers, sponsors and supporters of Plaintiff the League of United Latin American Citizens (LULAC) founded in Texas in 1929, as to the source of the services and constitutes trademark infringement in violation of the *Lanham Act*, 15 U.S.C. § 1114.

28. Plaintiff LULAC has no control over the nature and quality of the non-profit advocacy offered by Defendants under the Defendant NLLAC name, and confusion is likely to arise with respect to the ownership or management of organization services owned and managed by Defendants. As a result Plaintiff LULAC's goodwill with respect to the "LULAC" Marks will suffer.

29. Plaintiff LULAC has tried everything reasonable to control the Luevanos and John Tucker from using the "LULAC" Marks for their own personal gain and Defendant's the Luevano's and Tucker refuse. Thus Plaintiff LULAC has no control over the nature and quality of the advocacy offered by Defendants the Luevano's and Tucker which is misleading and will continue to mislead and confusion is likely to arise with respect to the unauthorized management of organization services managed by Defendants'. As a result Plaintiff LULAC's goodwill with respect to the "LULAC" Marks will suffer.

30. The goodwill of Plaintiff LULAC under the "LULAC" Marks is of substantial value to Plaintiff LULAC, and Plaintiff LULAC has suffered and will continue to suffer irreparable harm should the infringement by Defendants be allowed to continue.

31. Based upon information and belief, the trademark infringement by Defendants will continue unless enjoined by this Court. Pursuant to 15 U.S.C. § 1116, Plaintiff LULAC seeks a temporary restraining order, preliminary and permanent injunction against further trademark infringement by Defendants.

32. Defendants' acts of trademark infringement have caused harm and damage to

Plaintiff LULAC. The amount of these damages is not yet determined. Pursuant to 15 U.S.C. § 1117, Plaintiff LULAC is entitled to and seeks Defendants' profits if any, money raised, actual damages, and costs of this action, and such additional relief as may be deemed appropriate and proper.

33. On information and belief, Defendants' acts of trademark infringement have been and continue to be deliberate and willful and warrant an award of enhanced damages. In addition, Plaintiff LULAC is entitled to and seeks a finding that this case is exceptional and warrants an award of attorney's fees pursuant to 15 U.S.C. § 1117(a).

Count II
False Designation of Origin and Unfair Competition
Under 15 U.S.C. § 1125(a)

34. The allegations set forth in Paragraphs 1 through 33 are incorporated by reference as if fully set forth herein.

35. Defendants' acts described herein constitute false or misleading descriptions and/or representations of fact which are likely to cause confusion, mistake, or deception as to the affiliation, connection, or association of Defendants' services with Plaintiff LULAC's services in violation of the *Lanham Act*, 15 U.S.C. § 1125 (a) (1) (A) and constitute unfair competition.

36. Defendants' acts described herein further constitute a bad faith intent to benefit or profit from Plaintiff LULAC's Marks in violation of the *Lanham Act*, 15 U.S.C. § 1125(d)(1)(A) and constitute unfair competition.

37. Based on information and belief, Defendants will continue their acts of unfair competition unless enjoined by this Court. Pursuant to 15 U.S.C. § 1116, Plaintiff LULAC seeks a temporary restraining order, preliminary and permanent injunction against further acts of unfair competition by Defendants'.

38. Defendants' acts of unfair competition and false designation of origin have caused

harm and damage to Plaintiff LULAC. The amount of these damages is not yet determined.

Pursuant to 15 U.S.C. § 1117(a), Plaintiff LULAC is entitled to and seeks Defendants' profits, if any, money raised, actual damages, and costs of this action and such additional relief as may be deemed appropriate and awarded by this Court.

39. On information and belief, Defendants' acts of unfair competition and false designation of origin have been and continue to be deliberate and willful, and warrant an award of enhanced damages. In addition, Plaintiff LULAC is entitled to and seeks a finding that this case is exceptional and warrants an award of attorney's fees pursuant to 15 U.S.C. § 1117(a).

Count III Common Law Trademark Infringement

40. The allegations set forth in paragraphs 1 through 39 are incorporated by reference as if fully set forth herein.

41. One or more of the "LULAC" Marks is eligible for protection under common law.

42. Plaintiff LULAC enjoys common law rights to the exclusive use of one or more of the "LULAC" Marks in the state of California in connection with a non-profit advocacy organization and any legal use thereof.

43. "LULAC" has acquired secondary meaning in each of the "LULAC" Marks.

44. Plaintiff LULAC began using one or more of the "LULAC" Marks prior to Defendants' use thereof, and in connection with Defendants' activities as a non-profit advocacy organization, including but not limited to Plaintiff LULAC's Constitution, Protocol, By-Laws and membership.

45. Defendants' past and current use of the "LULAC" Marks constitutes trademark infringement under common law.

46. Defendants' acts further constitute a malicious, fraudulent, or grossly negligent attempt to benefit or profit from Plaintiff LULAC and its "LULAC" Marks in violation of its

trademark rights.

47. The offering by Defendants' of services or solicitation of donations and/or contributions, using confusingly similar marks is likely to cause and has caused confusion as to the source of origin of the services, in that using "LULAC" and/or "NLLAC" services or the solicitation of donations or contributions are likely to associate or have associated such services, donations or contributions as originating with Defendants, all to the detriment of and resulting in damages to Plaintiff LULAC.

48. Defendants' acts of common law trademark infringement have caused great harm and damage to Plaintiff LULAC. The amount of these damages is not yet determined. Plaintiff LULAC seeks actual damages, including but not limited to lost donations or contributions and such additional relief as may be deemed appropriate and awarded by this Court.

49. On information and belief, Defendants' acts of trademark infringement have been and continue to be deliberate, willful, with malice and/or gross negligence, thereby warranting an award of exemplary damages under (§3333 and §3294 of the California Civil Code)

50. Based on information and belief, Defendants' will continue their willful acts of trademark infringement unless enjoined by this Court. Plaintiff LULAC seeks a temporary restraining order, preliminary and permanent injunction against further acts of unfair competition by Defendants'.

Count IV Common Law Unfair Competition

51. The allegations set forth in paragraphs 1 through 50 are incorporated by reference as if fully set forth herein.

52. Defendants' conduct has and is likely to confuse, mislead, or deceive consumers, members, donors and contributors or potential consumers, donors, contributors and members, and constitutes unfair competition under the laws of the State of California.

53. Defendant's acts of common law unfair competition have caused great harm and damage to Plaintiff LULAC. The amount of these damages has not yet been determined. Plaintiff LULAC seeks actual damages, exemplary damages, and such additional relief as may be deemed appropriate and awarded by this Court.

54. On information and belief, Defendants' acts of unfair competition have been and continue to be deliberate and willful, with malice and/or gross negligence, thereby warranting an award of exemplary damages under (§3333 and §3294 of the California Civil Code).

55. Based on information and belief, Defendants will continue their willful acts of trademark infringement unless enjoined by this Court. Plaintiff LULAC seeks a temporary restraining order, preliminary and permanent injunction against further acts of unfair competition by Defendants.

Count IV
Fraud under California Civil Code § 1572

56. The allegations set forth in paragraphs 1 through 55 are incorporated by reference as if fully set forth herein.

57. Defendants have obtained funds that were intended for the use of Plaintiff LULAC's stated purposes. Defendants created at least three non-profit corporations to be used as collectors of funds that were intended to go to Plaintiff LULAC; however, Defendants funneled, diverted, and/ or misappropriated these funds for their own purposes.

58. Defendants misled the Hilton Oakland Airport Hotel (Oakland CA) by misrepresenting the payment of the balance owed to said Hotel, Spring of 2009 (Exhibit 9). It is unknown if said balance was ever satisfied as Defendants failed to provide an accounting of said funds.

59. Defendants misled various sponsors and supporters into believing that the funds

that were being solicited were going to be spent on the Spring 2010 California State LULAC Convention. The funds were solicited through California League of United Latin American Citizens Institute (also known as CLI, Exhibit 10). There was never an accounting of said funds, and Plaintiff does not know where the money was nor if it was spent on the Convention costs.

60. Based on information and belief, it is alleged that Defendants raised funds for "Youth Activities" but subsequently cancelled said activities at aforementioned conventions and did not account for the disbursement of said funds.

61. On information and belief, it is alleged that Defendants used California State LULAC bank accounts for unauthorized dispersals and withdrawals. Defendants opened and closed bank accounts using either of the three non-profit corporations that they formed for the purpose of fundraising, soliciting charitable contributions and corporate sponsorship, without the requisite authorization nor following the requisite by-laws and procedures.

62. Defendants continue to act in a fraudulent manner to the present day; a fundraiser in conjunction with other community groups is scheduled for Antioch, Contra Costa County (CA) on October 12, 2013. Defendants continue to use the California LULAC Institute, Inc. to raise funds and they continue to represent that California LULAC Institute, Inc. is affiliated with Plaintiff LULAC.

62. Allegations based on information and belief will be verified at trial, currently, Defendants have failed to provide items that have been repeatedly requested by state and national officers of LULAC. The failure to comply with said requests provides proof of Defendants intent to permanently deprive LULAC of its rightful records and property.

63. On information and belief, Defendants' acts of fraudulent misrepresentation and deceit have been and continue to be deliberate and willful, with malice and/or gross negligence, thereby warranting an award of exemplary damages under (§3333 and §3294 of the California

Civil Code).

64. Based on information and belief, Defendants will continue their willful acts of fraud unless enjoined by this Court. Plaintiff LULAC seeks a temporary restraining order, preliminary and permanent injunction against further acts of fraud by Defendants.

Count V
Conversion of Property
under California Civil Code § 3336

65. The allegations set forth in paragraphs 1 through 64 are incorporated by reference as if fully set forth herein.

66. Defendants have misappropriated monies, funds, and contributions intended for the use of Plaintiff LULAC. Plaintiff has repeatedly requested records, audits, and/ or any information leading to the existence or whereabouts of said funds. To the present day, Defendants have offered no response as to the existence or whereabouts of said funds, depriving Plaintiff LULAC of said funds permanently.

67. Defendants obtained certain property that is the sole property of Plaintiff LULAC including records, banners, and other assorted items that establish Plaintiff's identity as the nationally recognized community service organization known as LULAC. Repeated efforts to re-acquire the property has been met with negative results, depriving Plaintiff of said property permanently.

67. On information and belief, it is alleged that the funds were collected were to be used for the California State LULAC, under Plaintiff LULAC's auspices. Funds were collected both out of state and nationally.

68. On information and belief, Defendants' acts of theft have been and continue to be deliberate and willful, with malice and/or gross negligence, thereby warranting an award of exemplary damages under (§3333 and §3294 of the California Civil Code).

69. Based on information and belief, Defendants will continue their willful acts of theft unless enjoined by this Court. Plaintiff LULAC seeks a temporary restraining order, preliminary and permanent injunction against further acts of theft by Defendants.

Count VI
Common Law Abuse of Process

70. The allegations set forth in paragraphs 1 through 69 are incorporated by reference as if fully set forth herein.

71. Defendants and each of them did cause to file and serve a complaint in State Court against Officers and Directors of Plaintiff LULAC and California State Officers and Directors.

72. Defendants filed said complaint (Exhibit 11), knowing that they did not have standing to file said complaint. Defendants filed said complaint knowing that there were no grounds for the Court to grant prayed for relief.

73. Defendants followed the advice and counsel of a convicted felon, disbarred Texas Attorney Bernabe Eureste. Language that Defendant Eureste used in his blog 'The Voice of the Mainland' (Exhibit 12) was followed word for word in the complaint filed in State Court. Legal tactics that were described by Defendant Eureste in said blog were followed to the letter in the course of the court calendar. Defendant Eureste by advising and counseling the other Defendants was practicing law without a license.

74. Defendant Jan Tucker was at the time of the filing of the complaint, the Parliamentarian for California State LULAC, and in a conflict of interest, he became the private investigator for the Defendants assisting them in their lawsuit. Defendant Tucker did not disclose to the properly elected officers, that he was acting in direct conflict to the interest of Plaintiff and was privy to information that he would not have been privy to had he so disclosed

his intent to work for Defendants. At the time of his defection, Defendant Tucker knew that the other Defendants had been expelled by Plaintiff LULAC and that there was no basis in law or fact for the complaint.

75. Defendants complaint was later dismissed for failure to comply with Court orders, follow Court rules and for not stating a basis in law or fact for the complaint.

76. During the pendency of the law suit, Defendants deprived Plaintiff of its property, continued to misrepresent themselves as officers of LULAC, and cost LULAC and its officers' time, money, and anguish in defending the suit.

Bench Trial Requested

77. Plaintiff LULAC hereby requests a bench trial on all issues so triable and as alleged in this Complaint.

Prayer

WHEREFORE, Plaintiff, LULAC, respectfully prays that this Court enter judgment as follows:

a. That Defendants, National League of Latin American Citizens (NLLAC), Bernardo Eureste, Angel G. Luevano, Argentina Davila-Luevano, and Jan B. Tucker jointly and severable, and its officers, agents, employees, attorneys, corporations, associations or companies under the control of Defendants', and all other persons in active concert and/or participation with Defendants', be temporarily, preliminarily and permanently enjoined from engaging in the acts of trademark infringement, unfair competition, and trademark dilution complained of herein, including without limitation use of the LULAC Marks and any confusingly similar mark;

b. That Defendants, National League of Latin American Citizens (NLLAC), Bernardo Eureste, Angel G. Luevano, Argentina Davila-Luevano, and Jan B. Tucker be ordered

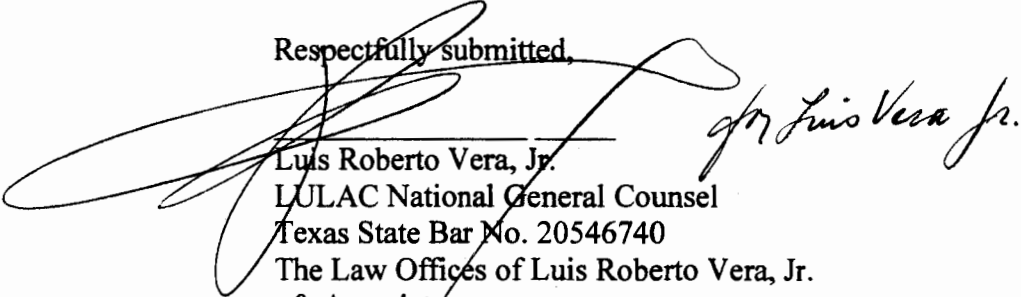
to provide and produce an accounting of all revenue received from donations, contributions or any other source resulting from their acts of trademark infringement and unfair competition complained of herein, and that Defendants', jointly and severable, pay Plaintiff LULAC all monies received by Defendants'' and all damages suffered by Plaintiff LULAC as a result of Defendants' acts of trademark infringement and unfair competition;

c. That the Court find that Defendants' acts of trademark infringement and unfair competition are deliberate and willful, that this is an exceptional case, and that Plaintiff LULAC be awarded enhanced damages, exemplary damages, attorneys' fees, and costs of court;

d. That Plaintiff LULAC be awarded prejudgment and post-judgment interest; and

e. For such other and further relief to which Plaintiff LULAC may show itself justly entitled.

Respectfully submitted,



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**Attorneys for the Plaintiff League of United
Latin American Citizens (LULAC)**

VERIFICATION

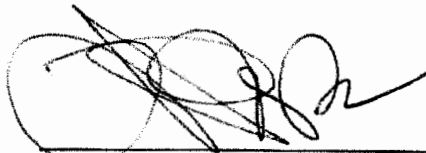
STATE OF TEXAS §

COUNTY OF BEXAR §

Before me, a duly licensed notary public, appeared on this day, Margaret Moran, and after being sworn by me stated the following;

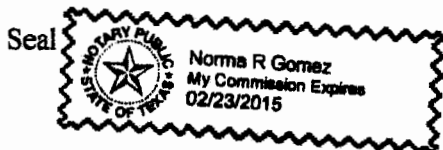
"I am the National Legal Advisor of the League of United Latin American Citizens (LULAC). I have read and understood the contents in these pleadings of trademark infringement against the National League of Latin American Citizens (NLLAC) and individual Defendants, Bernardo Eureste, Angel Luevano, Argentina Luevano and John Tucker. To the best of my personal knowledge and belief, all the facts stated in these pleadings and Motion for Temporary Restraining Order, Preliminary Injunction and Permanent Injunction are true and correct."

Further affiant sayeth not.



Manuel G. Escobar, Jr., National Legal Advisor
League of United Latin American Citizens

Sworn before me on this 3rd day of October, 2013.



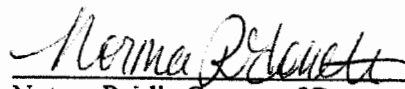

Notary Public County of Bexar
State of Texas
My Commission Expires 02/23/2015

EXHIBIT 1

TEXAS SECRETARY of STATE HOPE ANDRADE

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BUSINESS ORGANIZATIONS INQUIRY - VIEW ENTITY

Filing Number: 5967901 Entity Type: Domestic Nonprofit Corporation
Original Date of Filing: [REDACTED] Entity Status: In existence
Formation Date: N/A Non-Profit N/A
Type:
Tax ID: 17425182197 FEIN:
Duration: Perpetual
Name: [REDACTED]
Address: 201 E MAIN DR STE 605
El Paso, TX 79901-1352 USA

[REDACTED]		FILING HISTORY	NAMES	MANAGEMENT	ASSUMED NAMES	ASSOCIATED ENTITIES
Name	Address	Inactive Date				
Luis R. Vera	111 Soledad, Suite 1325 San Antonio, TX 78205 USA					

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BUSINESS ORGANIZATIONS INQUIRY - VIEW ENTITY

Filing Number: 5967901 **Entity Type:** Domestic Nonprofit Corporation
Original Date of Filing: June 15, 1931 **Entity Status:** In existence
Formation Date: N/A **Non-Profit Type:** N/A
Tax ID: 17425182197 **FEIN:**
Duration: Perpetual
Name: THE LEAGUE OF UNITED LATIN AMERICAN CITIZENS
Address: 201 E MAIN DR STE 605
 El Paso, TX 79901-1352 USA

REGISTERED AGENT		NAMES		MANAGEMENT	ASSUMED NAMES	ASSOCIATED ENTITIES	
View Image	Document Number	Filing Type	Filing Date	Effective Date	Eff. Cond	Page Count	
<input checked="" type="checkbox"/>	2982850	Articles of Incorporation	June 15, 1931	June 15, 1931	No	10	
<input checked="" type="checkbox"/>	240496790002	Articles of Amendment	May 9, 1940	May 9, 1940	No	4	
<input checked="" type="checkbox"/>	240497340002	Articles of Amendment	October 14, 1957	October 14, 1957	No	4	
<input checked="" type="checkbox"/>	240497450002	Report Notice	September 1, 1963	September 1, 1963	No	1	
<input checked="" type="checkbox"/>	240497540002	Notice of Forfeited Rights for non-filing of Periodic Report	February 1, 1965	February 1, 1965	No	1	
<input checked="" type="checkbox"/>	2982851	Involuntary Dissolution	September 1, 1965	September 1, 1965	No	1	
<input checked="" type="checkbox"/>	2982852	Nonprofit Periodic Report	September 17, 1967	September 17, 1967	No	1	
<input checked="" type="checkbox"/>	2982853	Reinstatement	September 21, 1967	September 21, 1967	No	3	
<input checked="" type="checkbox"/>	2982854	Articles Of Amendment	October 29, 1981	October 29, 1981	No	3	
<input checked="" type="checkbox"/>	2982855	Articles Of Amendment	March 8, 1982	March 8, 1982	No	4	
<input checked="" type="checkbox"/>	2982856	Report Notice	August 11, 1983	August 11, 1983	No	1	
<input checked="" type="checkbox"/>	2982857	Nonprofit Periodic Report	October 11, 1983	October 11, 1983	No	7	
<input checked="" type="checkbox"/>	2982858	Miscellaneous	November 4, 1983	November 4, 1983	No	1	
<input checked="" type="checkbox"/>	72521260001	Report Notice	October 22, 2004	October 22, 2004	No	1	
<input checked="" type="checkbox"/>	75836440001	Notice of Forfeited Rights for non-filing of Periodic Report	December 1, 2004	December 1, 2004	No	1	
<input checked="" type="checkbox"/>	87619970001	Involuntary Dissolution	April 8, 2005	April 8, 2005	No	1	
<input checked="" type="checkbox"/>	334785130002	Nonprofit Periodic Report	October 14, 2010	October 14, 2010	No	3	

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BUSINESS ORGANIZATIONS INQUIRY - VIEW ENTITY

Filing Number: 5967901 **Entity Type:** Domestic Nonprofit Corporation
Original Date of Filing: June 15, 1931 **Entity Status:** In existence
Formation Date: N/A **Non-Profit Type:** N/A
Tax ID: 17425182197 **FEIN:**
Duration: Perpetual
Name: THE LEAGUE OF UNITED LATIN AMERICAN CITIZENS
Address: 201 E MAIN DR STE 605
 El Paso, TX 79901-1352 USA

REGISTERED AGENT	FILING HISTORY	MANAGEMENT	ASSUMED NAMES	ASSOCIATED ENTITIES
Name THE LEAGUE OF UNITED LATIN AMERICAN CITIZENS	Name Status In use	Name Type Legal	Name Inactive Date	Consent Filing #

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BUSINESS ORGANIZATIONS INQUIRY - VIEW ENTITY

Filing Number: 5967901 **Entity Type:** Domestic Nonprofit Corporation
Original Date of Filing: June 15, 1931 **Entity Status:** In existence
Formation Date: N/A **Non-Profit Type:** N/A
Tax ID: 17425182197 **FEIN:**
Duration: Perpetual
Name: THE LEAGUE OF UNITED LATIN AMERICAN CITIZENS
Address: 201 E MAIN DR STE 605
 El Paso, TX 79901-1352 USA

REGISTERED AGENT	FILING HISTORY	NAMES	ASSUMED NAMES	ASSOCIATED ENTITIES
Last Update	Name	Title	Address	
October 14, 2010	Maragaret Moran	Member	P.O. Box 100931 San Antonio, TX 78201 USA	
October 14, 2010	Maggie Rivera	Member	555 Dartmoor Drive Crystal Lake, IL 60014 USA	
October 14, 2010	Mickie Luna	Member	P.O. Box 1446 Hollister, CA 95024 USA	
October 14, 2010	Margaret Moran	President	P.O. Box 100931 San Antonio, TX 78201 USA	
October 14, 2010	Esther Degraes	Vice-President	100 Stockton Street, Unit 418 Chelsea, MA 02150 USA	
October 14, 2010	Connie Martinez	Secretary	802 E. 46th Tucson, AZ 85713 USA	

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League of United Latin American Citizens

Word Mark LEAGUE OF UNITED LATIN AMERICAN CITIZENS
Goods and Services IC 200. US 200. G & S: Indicating membership in a(n) hispanic civic association. FIRST USE: 19290217. FIRST USE IN COMMERCE: 19290217
Standard Characters Claimed
Mark Drawing Code (4) STANDARD CHARACTER MARK
Serial Number 78873526
Filing Date May 1, 2006
Current Filing Basis 1A
Original Filing Basis 1A
Published for Opposition December 12, 2006
Registration Number 3213141
Registration Date February 27, 2007
Owner (REGISTRANT) League of United Latin American Citizens NON-PROFIT ORGANIZATION
TEXAS Suite 610 2000 L Street, NW Washington D.C. 20036
Type of Mark COLLECTIVE MEMBERSHIP MARK
Register PRINCIPAL
Live/Dead Indicator LIVE

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Date
Owner (REGISTRANT) League of United Latin American Citizens NON-PROFIT ORGANIZATION TEXAS
Suite 810 2000 L Street, NW Washington D.C. 20036
Type of Mark SERVICE MARK
Register PRINCIPAL
Live/Dead Indicator LIVE

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LULAC

Word Mark LULAC

Goods and Services IC 035. US 100 101 102. G & S: Association services, namely, promoting the interests of Hispanic Americans; charitable services, namely organizing and conducting volunteer programs and community service projects; conducting trade shows in the field of Hispanic culture and diversity; education leadership development; employment counseling and recruiting; lobbying services, namely promoting the interests of Hispanic Americans in the fields of legislation and regulation.
FIRST USE: 19290217. FIRST USE IN COMMERCE: 19290217

Standard Characters Claimed

Mark Drawing Code (4) STANDARD CHARACTER MARK

Serial Number 78873950

Filing Date May 1, 2006

Current Filing Basis 1A

Original Filing Basis 1A

Published for Opposition December 5, 2006

Registration Number 3211325

Registration February 20, 2007

EXHIBIT 4



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Trademarks > Trademark Electronic Search System (TESS)

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Word Mark LULAC
Goods and Services IC 035. US 100 101 102. G & S: Association services, namely, promoting the interests of Hispanic Americans; charitable services, namely organizing and conducting volunteer programs and community service projects; conducting trade shows in the field of Hispanic culture and diversity; education leadership development; employment counseling and recruiting; lobbying services, namely promoting the interests of Hispanic Americans in the fields of legislation and regulation. FIRST USE: 19290217. FIRST USE IN COMMERCE: 19290217

Mark Drawing Code (3) DESIGN PLUS WORDS, LETTERS, AND/OR NUMBERS

Design 01.01.10 - Stars, three or more; Three or more stars

Search Code 01.01.13 - Stars - multiple stars with five points

24.01.02 - Shields or crests with figurative elements contained therein or superimposed thereon

24.01.03 - Shields or crests with letters, punctuation or inscriptions contained therein or superimposed thereon

24.09.05 - American flags; Flags, American

Serial Number 78873962

Filing Date May 2, 2006

Current Filing Basis 1A

Original Filing Basis 1A

Published for Opposition December 5, 2006

Registration

Number 3211326
Registration Date February 20, 2007
Owner (REGISTRANT) League of United Latin American Citizens NON-PROFIT ORGANIZATION NEW YORK Suite 610 2000 L Street, NW Washington D.C. 20036
Description of Mark The color(s) red, white, and blue is/are claimed as a feature of the mark. The mark consists of A shield with a field of blue and thirteen white stars in the upper half, seven red and six white vertical bars in the lower half, and a diagonal white stripe with the letters LULAC imprinted in blue.
Type of Mark SERVICE MARK
Register PRINCIPAL
Live/Dead Indicator LIVE

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BUSINESS ORGANIZATIONS INQUIRY - VIEW ENTITY

Filing Number: 801628296 **Entity Type:** Domestic Nonprofit Corporation
Original Date of Filing: July 19, 2012 **Entity Status:** In existence
Formation Date: N/A **Non-Profit Type:** N/A
Tax ID: **FEIN:**
Duration: Perpetual
Name: TEXAS LEAGUE OF UNITED LATIN AMERICAN CITIZENS
Address: [ADDRESS NOT PROVIDED]

FILING HISTORY		NAMES	MANAGEMENT	ASSUMED NAMES	ASSOCIATED ENTITIES
Name	Address	Inactive Date			
Florinda Chavez	5400 Jeffburn Cove Austin, TX 78745 USA				

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Tax ID: **FEIN:**
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Name: TEXAS LEAGUE OF UNITED LATIN AMERICAN CITIZENS
Address: [ADDRESS NOT PROVIDED]

<u>REGISTERED</u> <u>AGENT</u>		<u>NAMES</u>	<u>MANAGEMENT</u>	<u>ASSUMED NAMES</u>	<u>ASSOCIATED</u> <u>ENTITIES</u>	
<u>View</u>	<u>Document</u>				<u>Eff.</u>	<u>Page</u>
<u>Image</u>	<u>Number</u>	<u>Filing Type</u>	<u>Filing Date</u>	<u>Effective Date</u>	<u>Cond</u>	<u>Count</u>
N/A	431800830002	Certificate of Formation	July 19, 2012	July 19, 2012	No	N/A

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Name: TEXAS LEAGUE OF UNITED LATIN AMERICAN CITIZENS
Address: [ADDRESS NOT PROVIDED]

<u>REGISTERED AGENT</u>	<u>FILING HISTORY</u>	<u>MANAGEMENT</u>	<u>ASSUMED NAMES</u>	<u>ASSOCIATED ENTITIES</u>
Name TEXAS LEAGUE OF UNITED LATIN AMERICAN CITIZENS	Name Status In use	Name Type Legal	Name Inactive Date	Consent Filing # 0

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Formation Date: N/A **Non-Profit** N/A
 Type:
Tax ID: **FEIN:**
Duration: Perpetual
Name: TEXAS LEAGUE OF UNITED LATIN AMERICAN CITIZENS
Address: [ADDRESS NOT PROVIDED]

<u>REGISTERED AGENT</u>	<u>FILING HISTORY</u>	<u>NAMES</u>	<u>ASSUMED NAMES</u>	<u>ASSOCIATED ENTITIES</u>
Last Update	Name	Title	Address	
July 20, 2012	Florinda Chavez	Director	5400 Jeffburn Cove Austin, TX 78745 USA	
July 20, 2012	Joe Cardenas III	Director	5400 Jeffburn Cove Austin, TX 78745 USA	
July 20, 2012	Beatrice Martinez	Director	5400 Jeffburn Cove Austin, TX 78745 USA	

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EXHIBIT 6

EXHIBIT 7

Reproduced: Voice of the Mainland 7/23/2012

Texas LULAC Incorporates as a Not-for Profit Corporation

The Texas League of United Latin American Citizens met today in a special called meeting of the State Board of the organization. The meeting was held in Austin, Texas and lasted from 10:15 AM to 4:30 PM. The purpose of the meeting was to announce the incorporation of the organization as a not-for-profit corporation.

The meeting was chaired by Linda Chavez, the State Director of the organization.

As part of its first order of business, a major resolution was proposed for consideration by the Texas Board. The resolution was discussed and after a couple of minor amendments, the resolution was passed unanimously by the Texas Board.

This resolution should be read word for word to understand in clear words where the Texas Board of the Texas League of United Latin American Citizens is today. In brief, the Texas Board certified the election of all of the officers of the Texas organization who were elected into office at the State Convention of the State organization, it did not recognize the actions of the National LULAC Board against Texas LULAC nor did it find constitutional authority for the National LULAC Board to take such draconian and punitive measures against the membership of Texas LULAC and instructed its officers to fulfill their oaths of office and responsibilities to the membership of Texas LULAC by proceeding to carry out the business of the state.

This resolution appears here and here, below

<http://www.scribd.com/doc/100722404/Texas-LULAC-Resolution>

and just below this article entitled "Texas LULAC Resolution"

The following actions were also proposed and passed unanimously by the Texas Board.

In its order of business, the Board voted to amend the Articles of Incorporation of the organization have the Districts of the organization, the Councils of the respective Districts and the Members of the the respective Councils are members of the organization.

A second action passed by the Board was to amend the Article of Incorporation to replace the three persons who formed the corporation with the officers who were elected by the Texas General Assembly of the Texas League of United Latin American Citizens, the Past State Director of the Texas League of United Latin American Citizens and the District Directors of the Texas League of United Latin American Citizens, creating the following as officers of the organization as incorporated:

Linda Chavez as the State Director of the Texas League of United Latin American Citizens;
Bea Martinez as the State Deputy Director of the Texas League of United Latin American

Citizens;

Lourdes Galvan as the Deputy Director for the Elderly of the Texas League of United Latin American Citizens;

Mary Lou Canales as the Deputy Director for Women of the Texas League of United Latin American Citizens;

Mary Ramos as the Treasurer of the Texas League of United Latin American Citizens for Texas LULAC;

Christina Garcia as the Deputy Director for Youth of the Texas League of United Latin American Citizens;

Pete Anzaldua as the Deputy Director for Youth for Texas LULAC of the Texas League of United Latin American Citizens;

Joey Cardenas to serve on the Board as the Past State Director of the Texas League of United Latin American Citizens; and

each of the District Directors of the Districts of the Texas League of United Latin American Citizens for District 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 17, 18, 20 and 21.

A third action passed by the Board was to authorize the opening of a checking account. Some of you will recall that the National Board of LULAC illegally had the bank where the Texas League of United Latin American Citizens had the state organization's hard earned money in a checking and money interest account frozen. It is a federal felony crime to change signatories to a bank account without the authorization of the persons who manage the funds of the Texas League of United Latin American Citizens and the act of gross negligence for the officers of the bank to have authorized the change to the bank account that was ordered by the National Board of LULAC. The amount of funds frozen exceeds \$30,000.00.

The officers of the Texas League of United Latin American Citizens, incorporated as they are today, had had enough from National. They are ready to take the National LULAC bull by the horns.

The Texas Board of the Texas League of United Latin American Citizens, now incorporated, are asking all state LULAC organizations to stick together. They are asking the Members, the Councils and the Districts of the Texas League of United Latin American Citizens to stick together.

The incorporation of the Texas League of United Latin American Citizens was at least two years in the planning.

Article I of the Constitution of LULAC is the authority that each state has to incorporate.

Section 2—Legal Status: The League of United Latin American Citizens shall be incorporated and chartered under the laws of each of the states in which it operates as a civic and non-profit organization and under the Federal laws of the United States of America.

Once incorporated, the laws of the State of Texas, for Texas League of United Latin American Citizens, now incorporated, protect the members of the organization, its councils, its districts and its officers. Organizations that are incorporated cannot meddle in the affairs of another corporation. Lawyers and the courts refer this protective netting as the "corporate veil." The corporate board of Comcast does not have authority over the corporate board of AT&T and visa-versa.

A veteran member of LULAC read out the famous words of Martin Neimoller in framing the steps that Texas LULAC had laid out for the members of the proud Texas organization by reciting the famous lines...

Martin Niemöller, a prominent Protestant pastor who opposed the Nazi regime. He spent the last seven years of Nazi rule in concentration camps. Germany, 1937.

— Bildarchiv Preussischer Kulturbesitz

Martin Niemöller (1892-1984) was a prominent Protestant pastor who emerged as an outspoken public foe of Adolf Hitler and spent the last seven years of Nazi rule in concentration camps. Niemöller is perhaps best remembered for the quotation:

First they came for the Socialists, and I did not speak out--

Because I was not a Socialist.

Then they came for the Trade Unionists, and I did not speak out--

Because I was not a Trade Unionist.

Then they came for the Jews, and I did not speak out--

Because I was not a Jew.

Then they came for me--and there was no one left to speak for me.

cite: <http://www.ushmm.org/wlc/en/article.php?ModuleId=10007392>

The United States Holocaust Memorial Museum

The LULAC story line is, first they came after Bernardo Euseste, when he was expelled from LULAC by the National LULAC Board, next they came after the Angel and Argentina Luevanos, when the National LULAC Board removed each one of them from the office each held as State Director of California LULAC and as Vice President for the Far West, next they came after Joey Cardenas when the National LULAC Board removed him from his office as State Director of Texsa LULAC, next they came after Linda Chavez, when they removed her from her

position as State Director of Texas LULAC, next they came after Bea Martinez when the National LULAC Board removed her from her position as Deputy State Director of Texas LULAC, next they came after Lourdes Galvan when the National LULAC Board removed her from her position as Deputy State Director for the Elderly of Texas LUAC, next they came after they removed Pete Anzaldua from his position as Deputy State Director for Youth of Texas LULAC, next they seized over \$30,000.00 that the Texas LULAC organization had in private bank accounts and took away the authority that Mary Ramos had as the Treasurer of Texas LULAC to manage the bank accounts of the organization. Each time the National LULAC Board acted against one of our Texas LULAC brothers and sisters, I was not one of them, and when they come for me, who is going to be around to defend me. The Texas League of United Latin American Citizens, Inc. is standing its ground.

EXHIBIT 8

From: Joey Cardenas

[mailto:joey_cardenas@hotmail.com]

Sent: Friday, July 20, 2012 1:35 PM

To: lccastillo@msn.com; aaliyah504@gmail.com;
rgsambrano@tx.rr.com; eliarmendoza@satx.rr.com;
gonzalez.5@verizon.net; florindachavez@sbcglobal.net;
marycanales50@suddenlink.net; vbtena@yahoo.com;
lico@eaze.net; casconst81@yahoo.com;
cvaladezmata@aol.com; hsgarcia77022@yahoo.com;
rapidruben@sbcglobal.net; rlh0812@yahoo.com;
arod708@yahoo.com; bnymtz@aol.com;
bamrealtor@aol.com; jejaques1@yahoo.com;
agsonny35@yahoo.com; hflores@lulac.org;
jyb5789@aol.com; hcarrillo29@hotmail.com;
genaroc2004@yahoo.com; lulaczapatista@yahoo.com;
edward.elizondo@gmail.com; marylramos@hotmail.com;
joe.castillo@tx-lulac.org; ray@manceragroup.com;
rwwilson@gws-law.com

Subject: The leadership of today

Importance: High



League of United Latin American Citizens

Texas LULAC

TX STATE DIRECTOR

Linda Chavez

SPECIAL ADVISOR

Angie Garcia

CHIEF OF STAFF

Mary Ramos

Parliamentarian

Ray Mancera

CIVIL RIGHTS CHAIR

Henry Rodriguez

EDUCATION CHAIR

Velma Ybarra

CORPORATE CHAIR

Isa Arellano

LEGAL ADVISOR

Robert Wilson

HOPE Chair

Hector Flores

TX STATE OFFICERS

Joey Cardenas III
Immediate Past Director &

Executive Director

Beatrice Martinez

July 20, 2012

Dear LULAC Brothers and Sisters,

In 1988, a courageous young man from Arizona proposed that LULAC should have a means to bridge the gap that existed between the youth LULAC councils and the adult LULAC councils, and so in 1989, the National convention granted David Hernandez the honor of establishing the LULAC young adult councils. While the concept was new, it quickly found a following among the college and university students where youth LULACers could transition and continue in their service to LULAC and at the same time bring in new membership.

In 1990, I became the President and organizer of council 4512 at Southwest Texas State in San Marcos becoming the second young adult council in Texas after McLennin Community College in Waco. As young adults we were determined to be an integral part of the politics of the day while transforming LULAC into a more progressive and younger organization. Many young adult members belonged to other college organizations, but only LULAC gave us the political mechanism that we needed to affect change and hold real political sway. In 1991, I became the second person to hold the office for the Texas young adults and the youngest person with a vote to ever sit on the state board. During this time we expanded the young adults across the state, marched, rallied, and gathered at young adult conferences. By 2004, I was elected to the national board of LULAC representing the young adults with the idea that young adults should be the only ones to hold that office and to set their own agenda. I vacated the position after two years as promised when a suitable young adult could take over the position; my successor Michelle Palayo did the same and so the position has been held by a young adult ever since. At all points of this involvement, I enjoyed and had the honor of having the support of the young adults and especially humbling was the support of past young adults members who had returned home to start their own councils. The young adults had quickly established themselves as leaders within the organization and role-

Deputy State Director

Elia Mendez
Treasurer

Yajaira Gonzalez
Youth State Director

Cristina Garcia
Deputy for Young Adults

Luis Castillo
Deputy for Youth

Mary Lou Caneles
Deputy for Women

Richard Sambrano
Deputy for Elderly

DISTRICT DIRECTORS

Armando Garcia
District 1- Lubbock

Paul Castillo
District 2- San Marcos

Des Martinez
District 3- Dallas

Virginia Tena
District 4- El Paso

Ruben Ramirez
District 6- Midland/Odessa

Cynthia Valdes-Mata
Jr.
District 7- Austin

Herlinda Garcia
District 8- Houston

Elma Jaques
District 9- San Angelo

Benny Martinez
District 10- Victoria

Totay Armadillo
District 11- Corpus Christi

Gavino Fernandez
District 12- Austin

Pope Trujillo
District 13- Weslaco

Arturo Gutierrez
District 14- Laredo

Gabriel Rosales

models for the youth; young adult members were the soldiers, the grunts, and conscious of the organization. We filled the workshops, asked the questions, learned from our elders, memorized our past struggles, demanded Chicano studies, and took to the streets, occupied buildings with sit-ins and demanded change; but never once, did we allow ourselves to be compromised by favors or gifts or promises of positions. We were not for sale!

Today, I do not pretend to be anything to or for the young adults; I am no longer among their ranks, but I remember their struggles and aspirations as students and leaders. And, I applaud all the work that they have done and continue to do in our communities. But as of recently, I have questioned the deafening silence of the young adults on the issue of what National is doing to Texas LULAC. I know that most prefer to remain neutral on the issue and stay out of it; and I can understand that, but in my mind, I can neither defend nor respect that choice because so much is at stake and we are so close to transforming this organization in fulfillment of one of the original purpose for which the young adults were founded! And while I had discussed this concern with various young adults in private in the hopes of getting their leadership to take a stance one way or the other, nothing happened; sadly, the young adults would be silent!

But, I am pleased to tell you Brothers and Sisters, that there is still leadership among the young adults, that some still exhibit that spark of change and risk for which they were founded. The future of a more progressive Texas LULAC will have brighter days in the hands of our young adults who dare to take a stand, not because it benefits them, but because it is the right thing to do for Texas LULAC and our community. Again, I have been reminded of the power of membership, of those persons in our organization who do not hold an office or have a title, but who represent the very essence of our being and the backbone of this organization that has survived for eighty plus years because of their continued support and unwillingness to be silent when the moment calls for action. On behalf of the state board of Texas LULAC, I want to thank all of you, the members, who have sent encouraging remarks of the need to continue with the reforms of the state in spite of the actions of national; and especially to the young adults who have distinguished themselves to the leadership of Texas LULAC in this time of transition; and most especially to the young adult, Michael Lugo, who wrote the following exhibit which is a testament to the power of the young adults and the leadership of the future! THANK YOU!

-joey cardenas III, member of Texas LULAC

The following is an analysis by young adult member Michael Lugo of what the LULAC Constitution says on the issue in regards to the action taken by National LULAC against Texas LULAC:

The Oath of office requires me, and the rest of the board to

District 15- San Antonio

Rosa Hernandez

respectfully reject the unconstitutional ruling of the National Board of Directors.

District 17- Temple

Juan Garcia

Authority: Bylaws, Article 1, Section 3: promise faithfully to perform all

District 18-Houston

the duties imposed upon me as officer of the League of United Latin American Citizens by its constitution, Bylaws, Protocol or by any resolution passed.

Josefina Moreno

District 20- McAllen
Lico Reyes

It is my duty to remind the National Board of Directors that State elected officers cannot be appointed by any governing body of the league. They are elected by a majority vote of the accredited delegates to the State Assembly.

District 21- Fort Worth

Authority: Constitution Article IX, Section 5:

All elective State Officers shall be elected by a

majority vote of the accredited delegates to the State Assembly.

The National Board of Directors is not allowed to waive this constitutional requirement.

Authority: Constitution Article VI, Section 2, Sub-Section C:

The National Board of Directors is not empowered:

(1) To amend or waive the constitution and bylaws.

Furthermore, should Margaret Moran decide to assume the Texas State Director office, she would be violating the constitution, which is grounds for impeachment. As well as any other member of the National Board of Directors who insist on appointing "elective" officers.

In addition, any member of the National Board of Directors who chooses to ignore their responsibility as member of the league and is under the jurisdiction of Texas LULAC will automatically face charges at the council level.

Authority: Constitution Article VIII, Section 8, Subsection B, Item 2:

Charges against members shall be presented at the council level.

District Directors will instruct the council to expel/or suspend from its ranks these members for actions in violation of the Constitution and Bylaws.

Authority: Constitution VI, Section 8, Sub-Section C, Item (6):

[Council Powers]To suspend or expel from its ranks

any member guilty of actions contrary to the best interests of

the council or the League in general, as provided in

Article VIII, Section 8, Subsection a. (1) thru (8)

Authority 2: Constitution Article VIII, Section 8, Subsection A, Item (2):

Actions prejudicial or contrary to or in violation of the

constitution and bylaws, aims and purposes, code, resolutions,

policies or customs of the league.

If the council should decide not to hold these people accountable to the constitution then the District Executive Board shall revoke the council's charter.

Authority: Constitution Article VI, Section 7, Subsection B, Item (2):

To declare Local Councils defunct

This will give Texas LUALC another avenue to hold accountable members of the National Board of Directors whose membership resides in Texas and decides to violate the constitution. Notice this is not impeaching an officer, nor removing an officer. It is the membership of the officer that will be at risk and consequently their office.

Finally, allow me to set something clear. The National Board of Directors may not hear or bring charges brought against an officer, member, or council without the approval of the National Assembly. Charges are brought to the National President to present to the National Assembly. Then National Assembly must order an investigation. Finally, the National Board of Directors can hold a

hearing to assess the charges and make its judgment. This is clear in both the Robert Rules of Order and the Constitution.

Authority: Constitution Article VI, Section 2, Subsection C:

The National Board of Directors is not empowered
to (2) assess any council or individual member of the
league unless such assessment is approved by the National Assembly.

EXHIBIT 9

Tara

From: Tara Capizano
Sent: Wednesday, June 17, 2009 3:14 PM
To: AALUEVANO@aol.com; 'aamentor2000@aol.com'
Cc: Edie Blackshire
Subject: Invoice from Hilton Oakland Airport

Good Afternoon,

I'm sorry we didn't get a chance to meet on Monday. I have attached a copy of the invoice from accounting.

As always, if you have any questions please don't hesitate to call/email.

Warm Regards,

Tara Capizano

Senior Event Manager |Hilton Oakland Airport
One Hegenberger Road| Oakland, Ca 94621
W (510) 383-4063 | F (510) 383-4090



FW: Invoice from Hilton Oakland Airport

Wednesday, January 26, 2011 3:06 PM

From: "Brent Wilkes" <bwilkes@lulac.org>

To: Moran0529@aol.com, "Escobarm1@aol.com" <escobarm1@aol.com>, vmluna@sbcglobal.net

1 File (1945KB)



Scan001....

Here is the invoice from the Hilton Oakland Airport Hotel. The Luevanos asked if I could intervene so that they would not have to pay a penalty for not filling their room block.

Brent A. Wilkes
National Executive Director
League of United Latin American Citizens
2000 L Street, NW, Suite 610
Washington, DC 20036
(202) 833-6130
FAX (202) 833-6135
www.LULAC.org

2673.00
2195.00
\$ 478.00
Performance Damage

From: aamentor2000@aol.com [mailto:aamentor2000@aol.com]

Sent: Thursday, June 18, 2009 2:43 PM

To: bwilkes@lulac.org; AALUEVANO@aol.com

Subject: Fwd: Invoice from Hilton Oakland Airport

Hello Brent,

I am sending you a copy of our invoice with the Hilton. I am reviewing the invoice so that we may discuss the concerns I have. Perhaps, after we talk about the charges you can intervene for us with the hotel and bring the cost down.

THX!

Angel

—Original Message—

From: Tara Capizano <Tara.Capizano@hilton.com>

To: consafos@peoplepc.com <consafos@peoplepc.com>

Cc: AALUEVANO@aol.com <AALUEVANO@aol.com>; aamentor2000@aol.com <aamentor2000@aol.com>

Sent: Thu, Jun 18, 2009 8:30 am

Subject: FW: Invoice from Hilton Oakland Airport

Good Morning Ricardo

Argentina asked that I forward the invoice to you for payment. It is attached.

Warm Regards,

Tara

From: Tara Capizano
Sent: Wednesday, June 17, 2009 3:14 PM
To: AALUEVANO@aol.com; 'aamentor2000@aol.com'
Cc: Edie Blackshire
Subject: Invoice from Hilton Oakland Airport

Good Afternoon,

I'm sorry we didn't get a chance to meet on Monday. I have attached a copy of the invoice from accounting.

As always, if you have any questions please don't hesitate to call/email.

Warm Regards,

Tara Capizano

Senior Event Manager |Hilton Oakland Airport
One Hegenberger Road| Oakland, Ca 94621
W (510) 383-4063 | F (510) 383-4090

Dell Days of Deals! June 15-24 - A New Deal Everyday!



Hilton Sales Worldwide also proudly represents Las Vegas Meetings by Harrah's Entertainment

From: Brent Wilkes [mailto:BWilkes@lulac.org]
Sent: Sunday, June 28, 2009 12:02 AM
To: Ronnette Martin
Cc: aamentor2000@aol.com; AALUEVANO@aol.com; Tara Capizano
Subject: FW: Invoice from Hilton Oakland Airport

Ronnette,

I need your assistance again...this time with the Hilton Oakland Airport where we held our California State Convention over the weekend of 6-12-09. We fell short on our block again, but also exceeded our food and beverage commitment by a considerable amount. Nevertheless they are asking for \$4,868 in damages despite the fact that the banquet staff thanked us profusely for bringing our conference to the hotel because they said business has been really slow.

We would like to apply the amount we exceeded on Food and Beverage toward the attrition as the Hilton Lincoln Center did. Can you help us? Enclosed is the billing statement. I spoke to the event manager while I was their but she said that this issue would need to be taken up with the head of sales who was not present during the conference.

Brent A. Wilkes
National Executive Director
League of United Latin American Citizens
2000 L Street, NW, Suite 610
Washington, DC 20036
(202) 833-6130
FAX (202) 833-6135
www.LULAC.org

—Original Message—

From: Tara Capizano <Tara.Capizano@hilton.com>
To: consafos@peoplepc.com <consafos@peoplepc.com>
Cc: AALUEVANO@aol.com <AALUEVANO@aol.com>; aamentor2000@aol.com <aamentor2000@aol.com>
Sent: Thu, Jun 18, 2009 8:30 am
Subject: FW: Invoice from Hilton Oakland Airport

Good Morning Ricardo

Argentina asked that I forward the invoice to you for payment. It is attached.

Warm Regards,



FW: Invoice from Hilton Oakland Airport

Wednesday, January 26, 2011 3:12 PM

From: "Brent Wilkes" <bwilkes@lulac.org>

To: Moran0529@aol.com, "Escobarm1@aol.com" <escobarm1@aol.com>, vmluna@sbcglobal.net

This is the response from my contact at the Hilton saying they lowered the charges.

Brent A. Wilkes
National Executive Director
League of United Latin American Citizens
2000 L Street, NW, Suite 610
Washington, DC 20036
(202) 833-6130
FAX (202) 833-6135
www.LULAC.org

From: Ronnette Martin [mailto:Ronnette.Martin@hilton.com]

Sent: Saturday, July 25, 2009 11:01 AM

To: BWilkes@lulac.org

Subject: RE: Invoice from Hilton Oakland Airport

Good morning Brent,

Hope this email finds you well today and you are getting some well deserved rest. I was trying to rearrange my schedule but, due to another a conflict in my schedule I unfortunately was unable to attend. I did hear it was a successful conference. I hope the Caribe Hilton & Conrad exceeding your expectations.

I wanted to send you a quick note to advise you the Hilton Oakland has sent a revise invoice. The performance damages of \$2673 has been reduced by 50% to \$1336.50.

If you have any questions or concerns please do not hesitate to contact me.

Have a wonderful weekend!

RONNETTE MARTIN

Director of Multicultural Sales-Hilton Sales Worldwide

2050 Chenault Drive, Carrollton, TX 75006 | O: 972.701.3766 | F: 972.701.3786 | M: 214.532.4031

ronnette.martin@hilton.com | www.hiltonfamily.com

Ronnette,

The contact is Argentina Luevano. My understanding is that they feel the \$1,336.50 in attrition charges was still too high given the fact that they gave the hotel quite a bit of additional food and beverage business. The hotel staff indicated that they were very pleased to have the LULAC group in house because business had been really slow. It is an odd way of showing gratitude to assess a \$1,336.50 penalty to a non-profit. I think if they would eliminate the penalty they could get the balance of the what is due rather quickly.

Brent A. Wilkes
National Executive Director
League of United Latin American Citizens
2000 L Street, NW, Suite 610
Washington, DC 20036
(202) 833-6130
FAX (202) 833-6135
www.LULAC.org

From: Ronnette Martin [mailto:Ronnette.Martin@hilton.com]
Sent: Monday, August 24, 2009 7:24 PM
To: BWilkes@lulac.org
Subject: LULAC Invoice Due - Hilton Oakland
Importance: High

Brent,

Hope this email finds you well today. I need your assistance if all possible. The Hilton Oakland has been trying to receive payment for the June event, and has not been able to get a respond from the contact. Can you please advise who we can contact? Thanks for your assistance.

RONNETTE MARTIN

Director of Multicultural Sales-Hilton Sales Worldwide
2050 Chenault Drive, Carrollton, TX 75006 | O: 972.701.3766 | F: 972.701.3786 | M: 214.532.4031
ronnette.martin@hilton.com | www.hiltonfamily.com


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FW: LULAC Invoice Due - Hilton Oakland

Wednesday, January 26, 2011 3:13 PM

From: "Brent Wilkes" <bwilkes@lulac.org>

To: Moran0529@aol.com, "Escobarm1@aol.com" <escobarm1@aol.com>, vmluna@sbcglobal.net

Here is a series of emails in which the Hilton is seeking payment for \$33,878.45 balance due.

Brent A. Wilkes
National Executive Director
League of United Latin American Citizens
2000 L Street, NW, Suite 610
Washington, DC 20036
(202) 833-6130
FAX (202) 833-6135
www.LULAC.org

Handwritten notes: 34,884.95, 33,878.45, 1006.50, and a signature.

From: Ronnette Martin [mailto:Ronnette.Martin@hilton.com]

Sent: Monday, August 24, 2009 8:49 PM

To: BWilkes@lulac.org

Subject: RE: LULAC Invoice Due - Hilton Oakland

Brent,

Thanks for the quick response. The total balance due is \$33,878.45 in which the Hotel hasn't received anything at this time. Are you available to discuss this further tomorrow?

RONNETTE MARTIN

Director of Multicultural Sales-Hilton Sales Worldwide

2050 Chenault Drive, Carrollton, TX 75006 | O: 972.701.3766 | F: 972.701.3786 | M: 214.532.4031

ronnette.martin@hilton.com | www.hiltonfamily.com



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From: Brent Wilkes [mailto:BWilkes@lulac.org]

Sent: Monday, August 24, 2009 7:12 PM

To: Ronnette Martin

Subject: RE: LULAC Invoice Due - Hilton Oakland

Hilton Sales Worldwide also proudly represents Las Vegas Meetings by Harrah's Entertainment

From: Ronnette Martin
Sent: Wednesday, September 09, 2009 11:50 AM
To: 'bwilkes@lulac.org'
Subject: Hilton Oakland
Importance: High

Hi Brent,

Hope you enjoyed your Labor Day weekend. I wanted to follow up from my voice message. The Hilton Oakland has not heard from Argentina or received payment. Based on our relationship with LULAC the Hotel extended credit and reduced the attrition by 50%. The bill is over 30 days late. It is imperative the hotel receive payment no later than Wednesday September 30, 2009 to avoid collections.

I am in the office the remainder of the day please give me a call to discuss at your earliest convenience.

Ronnette

RONNETTE MARTIN

Director of Multicultural Sales-Hilton Sales Worldwide
2050 Chenault Drive, Carrollton, TX 75006 | O: 972.701.3766 | F: 972.701.3786 | M: 214.532.4031
ronnette.martin@hilton.com | www.hiltonfamily.com


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Hilton Sales Worldwide also proudly represents Las Vegas Meetings by Harrah's Entertainment



FW: Hilton Oakland

Wednesday, January 26, 2011 3:14 PM

From: "Brent Wilkes" <bwilkes@lulac.org>

To: Moran0529@aol.com, "Escobarm1@aol.com" <escobarm1@aol.com>, vmluna@sbcglobal.net

Another email about the past due amount

Brent A. Wilkes
National Executive Director
League of United Latin American Citizens
2000 L Street, NW, Suite 610
Washington, DC 20036
(202) 833-6130
FAX (202) 833-6135
www.LULAC.org

From: Ronnette Martin [mailto:Ronnette.Martin@hilton.com]
Sent: Wednesday, September 09, 2009 12:50 PM
To: bwilkes@lulac.org
Subject: Hilton Oakland
Importance: High

Hi Brent,

Hope you enjoyed your Labor Day weekend. I wanted to follow up from my voice message. The Hilton Oakland has not heard from Argentina or received payment. Based on our relationship with LULAC the Hotel extended credit and reduced the attrition by 50%. The bill is over 30 days late. It is imperative the hotel receive payment no later than Wednesday September 30, 2009 to avoid collections.

I am in the office the remainder of the day please give me a call to discuss at your earliest convenience.

Ronnette

RONNETTE MARTIN

Director of Multicultural Sales-Hilton Sales Worldwide
2050 Chenault Drive, Carrollton, TX 75006 | O: 972.701.3766 | F: 972.701.3786 | M: 214.532.4031
ronnette.martin@hilton.com | www.hiltonfamily.com



FW: Hilton Oakland Bill

Wednesday, January 26, 2011 3:15 PM

From: "Brent Wilkes" <bwilkes@lulac.org>

To: Moran0529@aol.com, "Escobarm1@aol.com" <escobarm1@aol.com>, vmluna@sbcglobal.net

In this email the hotel is threatening our credit status.

Brent A. Wilkes
National Executive Director
League of United Latin American Citizens
2000 L Street, NW, Suite 610
Washington, DC 20036
(202) 833-6130
FAX (202) 833-6135
www.LULAC.org

From: Ronnette Martin [mailto:Ronnette.Martin@hilton.com]
Sent: Tuesday, September 22, 2009 2:17 PM
To: bwilkes@lulac.org
Cc: Kerri Marshall; Mark Clement
Subject: Hilton Oakland Bill
Importance: High

Hi Brent,

I'm sorry we didn't connect earlier today. The reason for my was to inform you that our Hilton Oakland as of today has not received any payment for the services provided for the LULAC California State Convention held this past June. As mentioned in my previous email it is imperative that we receive by Wednesday 9/30. The amount due is \$33,878.45. If the Hotel does not receive by the above date, it will most likely be sent to collections, which will affect LULAC's credit status.

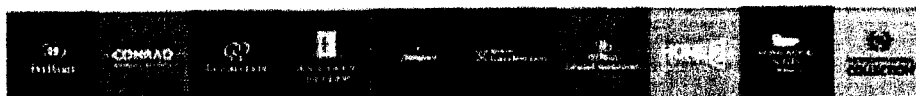
Brent, I will be out of the office starting tomorrow as I am getting married this weekend, and will not return to until Tuesday October 6th, 2009. I have copied Kerri Marshall the DOSM from the Hilton Oakland. If you should have any questions or concerns regarding this matter.

We appreciate all your efforts in assisting in this matter.

RONNETTE MARTIN

Director of Multicultural Sales-Hilton Sales Worldwide
2050 Chenault Drive, Carrollton, TX 75006 | O: 972.701.3766 | F: 972.701.3786 | M: 214.532.4031
ronnette.martin@hilton.com | www.hiltonfamily.com


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THE CALIFORNIA LULAC INSTITUTE

P.O. Box 4847 — Antioch, California 94531

925 813-2178 (cell)

AALuevano@aol.com (email) - WWW.lulaccalifornia.org (web site)

December 28, 2009

EXECUTIVE BOARD

Argentina Dávila-Luévano
President

Treasurer

Carlos Casares
Secretary

Al Rocha,
Director

Gerardo Dominguez,
UFCW5 Mercado's
Campaign Director

Mark Clement, General Manager
Hilton Oakland Airport
One Hegenberger Road
Oakland, California 94621

RE: Partial Hotel Payment in the amount of \$2000.00 – and
extension request to liquidate debt.


Dear Mr. Clement,

Attached please find a check in the amount of \$2000.00. This amount
serves to satisfy a partial payment with the request to set up a plan to
liquidate this debt as soon as possible.

We appreciate Mr. Brent Wilkes continuing efforts to discuss reducing
any added charges beyond the actual amounts.

Thank you for your consideration to our request.

Sincerely,


Argentina Dávila-Luévano
State Director, CA LULAC

cc: Brent Wilkes, Executive Director, National LULAC
Al Rocha, Deputy State Director, California LULAC
Treasurer, California LULAC

Enclosure

WELLS
FARGO

Prevention Contact Center
MAC A0143-043
P.O. Box 7406
San Francisco, CA 94120-7406

05/25/10

CALIFORNIA LULAC INSTITUTE INC
3712 BRUNSWICK CT
SOUTH SAN FRANCISCO CA 94080-5205

Re: Account Number: XXXXXXXXXXXXX3928

Dear Customer:

We are delaying the availability of the funds from the check(s) described below because we believe the check(s) may not be paid. The reason for the hold and the date on which the funds will be available for withdrawal are also described below:

Deposit Date/ Total Deposit Amount	Amount Delayed	Hold Reason/ Date Funds Will Be Available
05/24/10 \$800.00	\$800.00	Payment was stopped 06/03/10

We will be holding these funds until the date(s) indicated above. A hold means that although the check amount is credited to your account, the funds are not available for your use (please refer to the last page of this letter for more information about a hold on your account). To avoid overdrawing your account and incurring overdraft fees, during this time please do not make withdrawals or write checks against these funds.

If the check(s) listed above is returned, we will mail a notice to you the same day and deduct the amount of the check(s) from your account. A deposit item return fee will also be deducted from your account for each check returned (unless your account does not assess a fee for returned checks). Please refer to your Account Fee and Information Schedule for the amount of the fee.

We understand the inconvenience that can occur when a check is returned. If you have questions regarding the availability of funds, please refer to the information on the last page of this letter or contact one of our representatives at the telephone number printed on your monthly account statement.

We appreciate your business and thank you for banking with Wells Fargo.

Sincerely,

Prevention Contact Center

https://image.wellsfargo.com/imageman/display.do?sessionId=b0714fbf159354b87ad4bc651e6dfa... 5/29/2010



Wells Fargo Business Online®

View Returned Item

Original Deposit Information

Deposit Date	Description	Amount
05/24/10	Deposit	\$800.00

Returned Item Details (1 of 1 images)

Return Date	Reason	Bank	Account#	Check#	Amount
05/28/10	Stop Pay	BK OF AMER NA	XXXXXX5531	3376	\$800.00

Note: The account number has been removed from the image(s) for security reasons. To obtain a full copy of the image, please send us a secure email or call us at 1-800-956-4442, 24 hours, 7 days a week.

SANTA ANA SECURITY SERVICES INC
ACCOUNT #
10678 W KATELLA AVE
ANAHEIM, CA 92804

Date 5-22-10 10-09/1228
1077

Pay to the Order of California LULAC \$ 800.00
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EXHIBIT 10

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- Education
- Environment
- Health
- Housing
- Immigration
- Legislative
- Seniors

Officers



December 22, 2009

Dear LULAC all,

LULAC wishes you and yours a Joyous and Blessed Holiday Season! The Holiday season is coming to a close. 2010 is right around the corner and brings us renewed

We invite you to visit www.lulaccalifornia.org and witness first hand the excitement right away! We will be electing our State Director and a new National President

LULAC California, the FarWest, our Youth and Young Adults have been at the forefront of Immigration reform. We continue to fight strongly for the passage of the Immigration Reform and Control Act. We have supported and have taken on numerous Civil Rights Cases; we have partnered with the "Mercado Workers Campaign," and United Farm Workers; LULAC has been instrumental in Environmental Justice and many health care issues affecting our community

Yet, while we are fully engaged and moving the Latino agenda in America forward with thoughtfulness and doing for others. From our house to yours we wish you a Merry Christmas and a Happy New Year!!

Sincerely,

Argentina Dávila Luévano

Argentina Dávila-Luévano, State Director
California LULAC

Angel G. Luévano

Angel G. Luévano, LULAC
National Vice President -FarWest Region

- **Scholarship Links**
- **Veterans**
- **Women**
- **Youth**
- **Young Adult**

- **Argentina Luevano / State Director**
- **Alberto Rocha / Deputy State Director**
- **Ricardo T. Mendoza / State Treasurer**
- **Cindy Pelayo / Deputy State Director for Women**
- **Rev. Deacon Sal Alvarez / Deputy State Director for Seniors**
- **Sandi Castanon-Ramirez / Deputy State Director for Youth**
- **Salena Esparza-Sotelo / Deputy State Director for Young Adults**
- **Gabby Espino / State Youth President**
- **Angel Luevano / Immediate Past State Director and National Vice**

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Officers

Argentina Dávila-Luévano | State Director
Angel Luevano | Immediate Past State Director
Dr. Alberto Rocha | Deputy State Director
Angelica Vasquez | Deputy State Director for Women
Nancy Pelayo | Deputy State Director for Young Adults

Contacts List

Angelo Montalvo | District
Carlos Casares | District E
Carlos Jaureque | District
Gil Flores | District Two
Jim Hensley | District Seve

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x

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Location & Contact: P.O. Box 4847, Antioch, CA 94531 - (925) 813-2:

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THE CALIFORNIA LEAGUE OF UNITED LATIN AMERICAN CITIZENS INSTITUTE (CLI)

POST OFFICE BOX 4847

Antioch, CA 94531

925 813-2178 (cell)

aaluevano@aol.com

www.LULACCalifornia.org

Dear Friends of LULAC,

Since our foundation in 1929, California League of United Latin American Citizens (LULAC) has been committed to the advancement of economic conditions, educational attainment, political influence, housing, health and civil rights of the Hispanic population of California. California LULAC has launched several programs since our inception including the Youth and Young Adults Commission, Women's Commission, Commission on the Elderly, Legislative Commission, and Civil Rights Commission.

California LULAC is a civil rights organization with over 70 state councils that makeup the national LULAC organization. Together the state LULAC councils have trained and found jobs for thousands of Latinos, built housing for thousands more, and provided 5 million dollars in scholarship paid to Latino students.

California LULAC relies on the support of individuals and organizations that also seek to champion Latino rights. Your support helps to fulfill the mission of LULAC and ensure a better life for Latin Americans in California.

Sincerely,

A handwritten signature in black ink, appearing to read "Argentina Dávila-Luévano".

Argentina Dávila-Luévano
President

MISSION: Advance the economic condition, educational attainment, political influence, health, and civil rights of Hispanics in the United States. The California League of United Latin American Citizens (LULAC) is an affiliated unit of LULAC National.

PURPOSE: To develop and implement programs, services, and policies which advance the organization's mission statewide and to support the local councils and districts that are engaged in the organization's mission at the local level.



CALIFORNIA LULAC INSTITUTE (CLI)

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\$40,000	\$25,000	\$10,000	\$5,000	\$2500	\$700
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ACTIVITY CALENDAR 2010

FEBRUARY

February 20, 2010 - California LULAC Institute & California LULAC State Board Meeting – Fresno, California

MARCH

March 8, 2010 – The California League of United Latin American Citizens – Capital Visits – Sacramento, California

March 8, 2010 - The California Legislative Latino Caucus & The League of United Latin American Citizens - Legislative Reception - Chops Steak House – 1117 11th Street – Sacramento, California

APRIL

April (DTBD), 2010 – Youth Summit – La Paz – Tehachapi, California

MAY

May 20, 2010 - California LULAC Women's Conference – Anaheim, California

May 21, 22, 23, 2010 – 63rd Annual State Convention and Exposition, Anaheim, California

May 23, 2010 – California LULAC Youth Concert – Anaheim, California

AUGUST

August (TBD) California LULAC Institute & California LULAC State Board Meeting – Buena Park, California

August (TBD) California Educational Foundation Scholarship Dinner – Buena Park, California

OCTOBER

October (DTBD), 2010 - Young (Youth) Women's Conference, Stockton, California

NOVEMBER

November (DTBD) California LULAC Institute and California LULAC State Board Meeting – Martinez, California

DECEMBER

December 16 - 17, 2010 -- LULAC Latino Telethon – Los Angeles, CA



THE CALIFORNIA LULAC INSTITUTE (CLI) HOW TO CONTACT US

Argentina Dávila-Luévano- State Director and President

P.O. Box 4847

Antioch, CA 94531

(925) 813-2178

aaluevano@aol.com / www.lulaccalifornia.org

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City

State

Zip

Phone

Fax

Email

Amount of Contribution

Sponsor Package Option

Credit Card Information

Name on Card

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Expiration Date

Please make checks payable to: California LULAC Institute

Please mail contributions to: California LULAC Institute

C/O Treasurer

P.O. Box 4847

Antioch, CA 94531

The California LULAC Institute is a 501(c)(3) organization.
Contributions may be deductible for income tax purposes. Tax ID #13-4368011



Fw: Modifications to Sponsorship for 2010 CA LULAC Convention

Saturday, October 16, 2010 8:50 PM

From: "Ricardo" <consafos@peoplepc.com>
To: "Mickey Luna" <vmluna@sbcglobal.net>
Cc: "xavierbaeza@sbcglobal" <xavierbaeza@sbcglobal.net>
1 File (15KB)



Conventi...

Another sponsorship update from Argentina in April 2010. r

—Forwarded Message—

From: AALUEVANO@aol.com
Sent: Apr 23, 2010 10:56 PM
To: consafos@peoplepc.com, jorgecas@earthlink.net, devaul_c@yahoo.com, vmmyre@yahoo.com, yvduncan@yahoo.com, cecilia.hernandez4@ssa.ocgov.com, robbiemunoz@yahoo.com, lupegutie@yahoo.com, verasm2@verizon.net
Subject: Modifications to Sponsorship for 2010 CA LULAC Convention

Convention Team,

Attached please find modifications to the sponsorship for 2010 CA LULAC Convention. Note that I had failed to note that \$250 would need to be part of the \$2500 donation packet from Cheyenne Cook, Director of Governmental Relations, Check into CASH! In Addition, I have added Walt Disney as coming in at \$5000, currently I am working out the paperwork kinks!!

In summary, I have added an "other" section for funding sources as they come in and or confirm.

Sincerely,

Argentina

PeoplePC Online
A better way to Internet
<http://www.peoplepc.com>



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PEOPLE'S EQUITY SUMMIT FOR A FAIR AND JUST COMMUNITY THE ROAD TO JUSTICE

Saturday, October 12, 2013
9:00 a.m. to 3:00 p.m.
(NO-COST & LUNCH PROVIDED)
HOLY ROSARY CHURCH / 1313 "A" Street / Antioch, CA 94531

ALDA PARTNERS AND CALIFORNIA LULAC INSTITUTE (DBA)
 THE EAST BAY ORGANIZING PROJECT
 SOCIOS DE ALDA Y EL INSTITUTO LULAC DE CALIFORNIA (HACIENDO NEGOCIOS COMO)
 PROYECTO ORGANIZATIVO DE LA BAHIA ESTE

FOR INFORMATION CALL : PARA INFORMACION LLAME A
 ARGENTINA DAVILA LUYANO: ANGEL G. LUYANO
 925.511.7178 925.511.7587 alderano@cali.org aximcentro7000@aol.com
<http://www.calulac.institute.org>

CUMBRE EQUIDAD DE LA GENTE PARA UNA COMUNIDAD JUSTA Y EQUITATIVA EL CAMINO A LA JUSTICIA

Sabado, 12 de Octubre de 2013
9:00 a.m. to 3:00 p.m.
(Sin costo y almuerzo incluido)
IGLESIA HOLY ROSARY / 1313 "A" Street / Antioch, CA 94531

SURF ALLIANCE

Mike Kaplan, Founding Member
For more information go to SURFALLIANCE.ORG

**Or Call Mike Kaplan at 702 750-9800 or
 Email him at mike@surfalliance.org**

The S. U. R. F. Alliance (Saving Urban Residential Families) is a coalition of numerous U.S. government approved (under IRS code 501c3) charities whose goal is to rehabilitate distressed American homeowners. SURF Alliance has created a program that is legally compliant with all state and federal laws, and eliminates all homeowners' liability for deficiency balances through short sales while allowing homeowners to remain in their homes with affordable monthly payments.

**STOP FORECLOSURE AND STAY IN YOUR HOME!!
 REMOVE YOUR LENDER WHO IS TRYING TO FORECLOSE**
**Learn to fight the foreclosure by purchasing the book
 available in English/Spanish**

California LULAC Institute Inc.

The California LULAC Institute (CLI) is a civic and charitable organization promoting full employment, jobs, health care and academic excellence in our communities, cities and schools.

**Support the CLI
programs by
making your
contribution
below:**

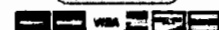
Community
Compliance Unit

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Conferences

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Home Ownership
Preservation Project

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[Click here to send us an email!](#)

HEALTH

Moreover, CLI partners, advocate and conducts programs in the areas of education, health care, housing, business, employment, immigration, and economic empowerment.

EXHIBIT 11

SUMMONS (CITACION JUDICIAL)

NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):

Benigno Diaz aka Benny Diaz, Rudy Rodriguez,
Rebecca Sandoval, Luis Roberto Vera, Jr;

YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):

Angel Luévano and Argentina Luévano

SUM-100

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

CONFORMED COPY
OF ORIGINAL FILED
Los Angeles Superior Court

JUL 30 2010

John A. Clarke, Executive Officer/Clerk

By AMBER LaFLEUR-CLAYTON Deputy
A.E. LaFLEUR-CLAYTON

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond to this summons. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda deshechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es)

LOS ANGELES SUPERIOR COURT
111 NORTH HILL STREET
LOS ANGELES, CA 90012

CASE NUMBER:
(Número del Caso): BC441648

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante o del demandante que no tiene abogado, es)

Angel & Argentina Luévano

3001 Kadiak St. Apt 129

DATE: ANTIOCH, CA 94531 Tel: (925) 813-2547 Clerk, by
(Fecha) JOHN A. CLARKE (Secretario)

AMBER LaFLEUR-CLAYTON

Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

(SEAL)

JUL 30 2010

NOTICE TO THE PERSON SERVED: You are served

1. ☒ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify)

3. ☒ on behalf of (specify) HENRY SACAZAR
under: ☐ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership) ☒ CCP 416.90 (authorized person)
☐ other (specify)

4. ☒ by personal delivery on (date) 8/14/10

SHORT TITLE:

CASE NUMBER:

Lucvano et al vs Diaz et al

INSTRUCTIONS FOR USE

- ▶ This form may be used as an attachment to any summons if space does not permit the listing of all parties on the summons.
- ▶ If this attachment is used, insert the following statement in the plaintiff or defendant box on the summons: "Additional Parties Attachment form is attached."

List additional parties (Check only one box. Use a separate page for each type of party.):

☐ Plaintiff ☒ Defendant ☐ Cross-Complainant ☐ Cross-Defendant

League of United Latin American Citizens, a California corporation, as a defendant pursuant to Section 382 C.C.P.

League of United LATIN AMERICAN CITIZENS, A TEXAS CORPORATION,
Miguel Gonzalez aka Mike Gonzalez aka Michael Gonzalez,
SANTA ANA Security Services, Inc., Beth Martinez, Henry
SALAZAR, Ricardo Mendoza and Does 1-150, inclusive.

Angel & Argentina Luevano
3001 Kodiak St Apt 129
Antioch CA 94531
Tel: 925.813.2547
Fax: 310.618.1950

CONFIRMED COPY
OF ORIGINAL FILED
Superior Court of California
County of Los Angeles

JUL 14 2013

John A. Clarke, Executive Officer/Clerk
By [Signature] Deputy
ROGENA LOPEZ

Plaintiffs in propria persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

Angel Luevano and Argentina
Luevano, Plaintiff,

vs.

~~Benigno Diaz aka Benny Diaz, Rudy Rodriguez, Rebecca Sandoval, Beth Martinez, Henry Salazar, Ricardo Mendoza, Luis Roberto Vera, Jr.; League of United Latin American Citizens a Texas corporation Miguel Gonzalez aka Mike Gonzalez aka Michael Gonzalez, Santa Ana Security Services, Inc. and Does 1-150, inclusive,~~

Defendants,

League of United Latin American Citizens, a California corporation, as a defendant pursuant to Section 382 C.C.P.

Case No.:

COMPLAINT: BC441643

1. Declaratory Relief
2. Libel Per Se
3. Invasion of Privacy
4. Declaratory Relief
5. Injunctive Relief

PLAINTIFFS ALLEGE AS FOLLOWS:

1. Plaintiff Angel Luevano is a resident of the County of Contra Costa and the State of California. At all times relevant herein, he ~~and~~ and has been the Vice President for the Far West Region of the League of United Latin

*Filed -
July 30th -
No longer
in dispute*

1 American Citizens, a Texas corporation, and a
2 member of the League of United Latin American
3 Citizens, a California corporation.

4 2. Plaintiff Argentina Luevano is a resident of
5 the County of Contra Costa and the State of
6 California. At all times relevant herein, she
7 is and has been the State Director of and a
8 member of the League of United Latin American
9 Citizens, a California corporation.

10 3. Defendant Benigno Diaz aka Benny Diaz is a
11 resident of the County of Orange and of the
12 State of California.

13 Defendant Rudy Rodriguez is upon the
14 information and belief of Plaintiffs [REDACTED]

15 [REDACTED] and the State of
16 California.

17 5. Defendant Rebecca Sandoval is a resident of the
18 County of Sacramento and the State of
19 California.

20 6. Defendant Beth Martinez upon the information
21 and belief of Plaintiffs is a resident of the
22 County of Orange and of the State of
23 California.

24 7. Defendant Henry Salazar is a resident of the
25 County of Los Angeles and of the State of
26 California.
27
28

*Plam
ended
5/22/10*

No

*No
longer
reside*

- 1 8. Defendant Ricardo Mendoza is a resident of the
2 County of Orange and of the State of
3 California.
- 4 9. Defendant Luis Roberto Vera, Jr. is upon the
5 information and belief of Plaintiffs a resident
6 of the County of Bexar and the State of Texas.
- 7 10. Defendant League of United Latin American
8 Citizens, a Texas Corporation is headquartered
9 in the District of Columbia.
- 10 11. Defendant League of United Latin American
11 Citizens, a California Corporation,
12 (hereinafter "LULAC California") is California
13 Corporation #C181912 and is the sole qualified
14 corporation by which Defendant League of United
15 Latin American Citizens (National), a Texas
16 corporation, purports to operate through in
17 California. Article Three of this entity's
18 Articles of Incorporation require it to be
19 headquartered in the County of Los Angeles.
20 LULAC California is a non-profit corporation
21 organized and existing under the laws of
22 California and qualified under Section 501(c)
23 (4) of the 'Internal Revenue Code of 1986 (as
24 amended), 26 U.S.C. §501(c) (4), as a
25 corporation organized and operated for the
26 purpose of enhancing educational and employment
27 opportunities and the enhancement of civil
28

1 rights for the benefit of the Hispanic
2 community in the United States.

3 12. Defendant Miguel Gonzalez aka Mike Gonzalez aka
4 Michael Gonzalez, hereinafter "Gonzalez," is a
5 resident of the County of Orange and the State
6 of California. At all times relevant herein
7 Gonzalez is and was the owner and qualified
8 manager of Santa Ana Security Services, Inc., a
9 California corporation.

10 13. Defendant Santa Ana Security Services, Inc. is
11 a California corporation in good standing,
12 licensed by the Bureau of Security and
13 Investigative Services as a Private Patrol
14 Operator, headquartered in the County of
15 Orange, State of California.

16 14. Does 1-39, inclusive, are any and all
17 individuals whose true full names are unknown
18 or not fully known to Plaintiffs, whose
19 capacities were as voting delegates to the
20 California State LULAC convention held in the
21 County of Orange on or about May 23, 2010, who
22 failed to tender payment for requisite delegate
23 fees prior to voting at said convention.

24 15. Does 40-55 are any and all individuals whose
25 true full names are not fully known to
26 Plaintiffs, but who distributed and/or
27 disseminated allegations from Exhibit 1
28 (attached and incorporated herein by reference)

1 at the LULAC California convention on or about
2 May 23, 2010.

3 16. Does 56-66 are any and all individuals who
4 purport to be lawful voting ex-officio
5 delegates and/or members of the LULAC
6 California Board of Directors by virtue of
7 their having been elected and/or appointed as
8 LULAC California State Directors during the
9 period LULAC California's Franchise Tax Board
10 suspension in 1958 up and until the restoration
11 of LULAC California's corporate status.

12 17. Does 67-150 inclusive are individuals and
13 entities whose true full names and capacities
14 are unknown or not fully known to Plaintiffs,
15 who elect to sue them under the fictitious name
16 of Doe, until such time as this Complaint can
17 be amended pursuant to Section 474 C.C.P.

18 18. The defendants and each of them in doing the
19 acts and omissions alleged herein acted as the
20 agents, employees, and/or co-conspirators of
21 each other according to a common purpose and/or
22 plan the objectives of which included but are
23 not limited to seizing control of LULAC
24 National and LULAC California and to
25 maliciously damage the reputations of those
26 opposing them by spreading falsehoods, abusing
27 their powers and authority, and by other
28 unlawful means.

FIRST CAUSE OF ACTION

Declaratory Relief

Against all Defendants

19. Within the First Cause of Action for Declaratory Relief, Plaintiffs reincorporate and re-allege by reference each and every allegation contained within the preceding paragraphs 1-18, inclusive.
20. LULAC California was originally organized as a California corporation on or about December 13, 1939 under the name "United Spanish American Workers of America. On or about February 21, 1942, this corporate entity, California Corporate file #C181912, changed its name to the "League of United Latin American Citizens."
21. Plaintiffs lack sufficient information or belief to determine whether or not LULAC California ever formally voted to affiliate with LULAC National, however, Plaintiffs are informed and believe and thereon allege that both LULAC California and LULAC National have behaved as though the two organizations were and are in fact affiliated to each other.
22. On or about 1958, LULAC California was ordered suspended as to its lawful corporate status by the California Franchise Tax Board. Plaintiffs are informed and believe and thereon allege that prior to the election of Plaintiff Angel

1 Luevano that LULAC California continued to
2 conduct business in violation of California law
3 and in violation of Article I of the LULAC
4 National Constitution which provides that all
5 state affiliates of LULAC National must be
6 incorporated with their state business
7 licensing authorities.

8 23. On or about May 21-23, 2010, LULAC California
9 held its annual Convention for the purpose of
10 adopting policy resolutions and electing new
11 officers in the County of Orange, State of
12 California.

13 24. On or about May 21, 2010, Defendant Vera,
14 acting under color of authority by virtue of
15 his position as national "legal adviser" to
16 National LULAC, purported to act as National
17 LULAC's "general counsel," and purported by way
18 of an e-mail (Exhibit 1, attached and
19 incorporated herein by reference) drafted on
20 May 21 but not sent until May 23 to Plaintiff
21 Angel Luevano to suspend from LULAC membership
22 Plaintiff Angel Luevano and Plaintiff Argentina
23 Luevano (hereinafter collectively the "Luevano
24 Plaintiffs"). This e-mail was also sent openly
25 to five (5) other LULAC National officials and
26 apparently was 'blind carbon copied' ("BCC") to
27 various persons at the California LULAC
28 convention who were internal political

1 opponents of the Luevano Plaintiffs, who in
2 turn began distributing and disseminating (Does
3 40-55) its content to delegates at the
4 convention prior to voting commencing.

5 25. At all times relevant herein, Defendant Vera
6 ~~lacked any authority whatsoever to suspend the~~
7 ~~membership rights of any member of LULAC in the~~
8 ~~absence of authority of the National Executive~~
9 ~~Board of LULAC.~~

10 26. At all times relevant herein, Defendant Vera
11 had actual knowledge that California law
12 provides that membership rights of a member of
13 a non-profit public benefit corporation cannot
14 be suspended without notice and an opportunity
15 to refute allegations leveled against a member.

16 27. At all times relevant herein Defendant Vera
17 knew or should have known that the only
18 theoretical culpability of Plaintiff Angel
19 Luevano for the acts and omissions Vera alleged
20 to have occurred in Exhibit 1 was the fact that
21 Angel Luevano is married to Argentina Luevano.
22 At all times relevant herein, Defendant Vera
23 chose to make his notification to the Luevano
24 Plaintiffs only through Plaintiff Angel Luevano
25 due to malicious and oppressive reasons,
26 including but not limited to sexism and/or
27 mysogeny.
28

1 28. The acts and omissions of Defendant Vera were
2 done as overt acts of the conspiracy alleged in
3 paragraph 17 of this complaint.

4 29. At all times relevant herein Does 56-66
5 participated in voting at the May 23, 2010
6 LULAC California election at the convention as
7 ex-officio delegates by reliance on their
8 purported service within LULAC while it was a
9 suspended corporation whose conduct of business
10 during their tenure as "State Directors" was
11 done in violation of public policy.

12 30. An actual controversy exists within LULAC
13 between the Plaintiffs and the Defendants
14 herein on the following issues:

15 (a) The legitimacy of the ex-officio status of
16 past state directors (Does 56-66) of LULAC
17 whose service was done while LULAC California
18 was a suspended corporation;

19 (b) The legitimacy of the votes cast by Does 1-39
20 and Defendant Gonzalez whose delegate status
21 was dependent upon the payment of a check
22 from Defendant Santa Ana Security Services,
23 Inc., a check which was dishonored by the
24 bank due to a stop-payment order by Defendant
25 Gonzalez after the voting had taken place;

26 (c) The authority or lack thereof of Defendant
27 Vera and/or LULAC National to suspend the
28 membership rights of members of LULAC

1 California in violation of the provisions of
2 the LULAC Constitution;

3 (d) The authority or lack thereof of Defendant
4 Vera and/or LULAC National to suspend the
5 membership rights of members of LULAC
6 California in violation of the provisions of
7 the California Non-Profit Public Benefit
8 Corporation Act;

9 (e) The legitimacy of the May 23, 2010 election
10 of LULAC California.

11 31. A judicial determination of these controversies
12 is necessary and desirable to vindicate the
13 public policies of the State of California and
14 to vindicate the rights of the Plaintiffs
15 pursuant to the California Non-Profit Public
16 Benefit Act.

17 **SECOND CAUSE OF ACTION**

18 **LIBEL PER SE**

19 **(Against all Defendants)**

20 32. Within the Second Cause of Action for Libel Per
21 Se, Plaintiff reincorporates and re-alleges as
22 though fully set forth herein each and every
23 allegation contained within the preceding
24 paragraphs 1-31, inclusive.

25 33. At all times relevant herein, Defendant Vera
26 knew that Plaintiff Angel Luevano was the Vice
27 President for the Far West Region of LULAC
28 National and a member of LULAC California.

1 34. At all times relevant herein, Defendant Vera
2 knew that Plaintiff Argentina Luevano was the
3 State Director of LULAC California.

4 35. At all times relevant herein, Defendant Vera
5 knew that the acts and omissions alleged in
6 Exhibit 1 fell within the course and scope of
7 the duties of Plaintiff Argentina Luevano and
8 not within the course and scope of the duties
9 of Angel Luevano.

10 36. At all times relevant herein Defendant Vera
11 knew that the allegations he made in Exhibit 1
12 against the Luevano Plaintiffs called into
13 question their qualifications to hold office
14 within LULAC National and LULAC California.

15 37. The allegations made in Exhibit 1 are either
16 untrue and/or exaggerated and/or intentionally
17 portrayed out of context. At all times
18 relevant herein, Defendant knew that the
19 allegations he leveled against the Luevano
20 Plaintiffs were untrue and/or exaggerated
21 and/or intentionally portrayed out of context.

22 38. At all times relevant herein, Defendant Vera
23 had no right nor obligation to disseminate
24 Exhibit 1 to any person other than the
25 President of LULAC National and/or the
26 Secretary of LULAC National and/or the
27 Executive Director of LULAC National.
28 Defendant Vera intentionally distributed

1 Exhibit 1 to persons at the LULAC California
2 convention for the express purpose of
3 interfering with the LULAC California elections
4 and to favor a faction that he personally
5 supported and with which he conspired to
6 interfere in and influence the LULAC California
7 election.

8 39. In doing the acts and omissions herein,
9 Defendant Vera and his co-conspirators acted
10 within the course and scope of their agency
11 with LULAC National. The acts and omissions of
12 these defendants were un-privileged and
13 actually malicious and oppressive as to the
14 rights of the Luevano Plaintiffs.

15 40. Plaintiffs bring suit for general damages
16 according to proof against the Defendants and
17 wherein, the acts and omissions of the
18 Defendants were malicious and oppressive,
19 Plaintiff bring suit for punitive and exemplary
20 damages according to proof.

21 **THIRD CAUSE OF ACTION**

22 **INVASION OF PRIVACY**

23 **(Against all Defendants)**

24 41. Within the Third Cause of Action for Invasion
25 of Privacy, Plaintiffs reincorporate and re-
26 allege by reference each and every allegation
27 contained within the preceding paragraphs 1-40,
28 inclusive as though fully set forth herein.

1 42. At all times relevant herein, Plaintiffs were
2 entitled to all the protections afforded by
3 Section 5341 of the California Corporations
4 Code.

5 43. Section 5341 of the California Corporations
6 Code requires that any suspension of membership
7 in a Non-Profit Public Benefit Corporation be
8 done in a manner which is fair and reasonable.
9 Any procedure which fails to respect the
10 personal privacy of any member accused of
11 misconduct and/or which disseminates the
12 accusations against members prior to providing
13 them with an opportunity to be heard and defend
14 themselves is inherently unfair and
15 unreasonable. The manner in which Defendant
16 Vera disseminated Exhibit 1 with the result
17 that it was made available to internal
18 political opponents of the Luevano Plaintiffs
19 immediately prior to the LULAC California
20 election was unfair, unreasonable, and a
21 violation of the Plaintiffs' legal and common
22 law privacy rights.

23 44. Plaintiffs have suffered and bring suit for
24 general damages according to proof and wherein
25 the conduct of the Defendants was actually
26 malicious, constituted a malicious disregard
27 for Plaintiffs' rights, and was oppressive,
28

1 Plaintiffs bring suit for punitive and
2 exemplary damages.

3 **FOURTH CAUSE OF ACTION**

4 **DECLARATORY RELIEF**

5 **(Against Defendants Santa Ana Security Services,**
6 **Inc., Miguel Gonzalez, and Does 77-80, inclusive)**

7 45. Within the Fourth Cause of Action for
8 Constructive Fraud, Plaintiffs reincorporate
9 and re-allege as though fully set forth herein
10 each and every allegation contained within the
11 preceding paragraphs 1-44, inclusive.

12 46. On or about May 22, 2010, Defendant Gonzalez
13 tendered payment of \$800.00 to LULAC California
14 by way of a check drawn on the account of Santa
15 Ana Security Services, Inc. for the express
16 payment of forty (40) delegate fees for various
17 LULAC California councils to vote at the LULAC
18 California Convention on May 23, 2010,
19 including his own delegate fee. Gonzalez then
20 proceeded to run as a candidate in the LULAC
21 elections and to urge persons whose fees he had
22 paid to support him and other candidates in the
23 LULAC California election. Defendant Gonzalez
24 was defeated in his own election effort but
25 candidates that he threw his support to
26 received more votes than other candidates and
27 were elected with support from delegates whose
28

1 legitimacy depended upon his payment of \$800.00
2 for their delegate fees.

3 47. Subsequent to the election at the LULAC
4 California convention, Defendant Gonzalez
5 stopped payment on the aforementioned \$800.00
6 check.

7 48. The convention parliamentarian, upon learning
8 of the stop-payment on the \$800.00 check and
9 upon request of Plaintiff Argentina Luevano,
10 ruled that the stop-payment on the check
11 effectively invalidated the election (see
12 Exhibit 2).

13 49. Defendant Vera, purporting to act on behalf of
14 LULAC National, purported to have the authority
15 to rule that the LULAC California election was
16 valid, that the delegates whose fees were paid
17 via the aforementioned \$800.00 check were
18 legitimate, and that Defendant Gonzalez was
19 legitimate in stopping payment on the check by
20 reason of a separate donation made towards
21 unrelated expenses, i.e., as if it was
22 legitimate to engage in barter for his own and
23 other delegates' fees.

24 50. Plaintiffs bring suit for Declaratory Relief by
25 the court to establish the following facts and
26 conclusions of law:

- 27 (a) The legitimacy of the May 23, 2010 LULAC
28 California election;

1 (b) That the stop-payment placed on the
2 aforementioned check (Exhibit 3) by
3 Defendant Gonzalez subsequent to its use to
4 pay for delegate fees at the May 23, 2010
5 LULAC California election constituted an
6 act of dishonesty and/or fraud as the term
7 is used in Section 7582.24 of the
8 California Business & Professions Code.

9 **FIFTH CAUSE OF ACTION**

10 **INJUNCTIVE RELIEF AND DAMAGES**

11 **(Against all Defendants)**

- 12 51. Within the Fifth Cause of Action for Injunctive
13 Relief, Plaintiffs reincorporate and re-allege
14 by reference each and every allegation
15 contained within the preceding paragraphs 1-50,
16 inclusive as through fully set forth herein.
- 17 52. The delegates entitled to vote at the State
18 Assembly have to be individual voting members
19 of California LULAC, in good standing "as
20 certified by the National Treasurer."
- 21 53. Each state officer is elected by securing a
22 simple majority of all voting.
- 23 54. On or about May 23, 2003, in California,
24 without authorization and without following the
25 procedures outlined by the rules of LULAC
26 National concerning elections and those
27 traditionally followed to ensure an orderly and
28 fair election (such as the delegates' approval

1 of the agenda, of the election procedures and
2 of the resolution procedures), the Defendants
3 and others proceeded to participate in an
4 election that resulted in the purported
5 election of the following Defendants to the
6 following offices: Benigno Diaz, State
7 Director, Rudy Rodriguez, Deputy State
8 Director, Rebecca Sandoval, Deputy State
9 Director Women, Beth Martinez, Deputy State
10 Director Young Adult, Henry Salazar, Deputy
11 State Director Senior, and Ricardo Mendoza,
12 State Treasurer.

13 55. For, among others, the reasons stated in the
14 First and Fourth Causes of Action the election
15 held on May 23, 2010, was invalid, the
16 Defendants were not properly and lawfully
17 elected according to the Constitution and
18 Bylaws of California LULAC, and they do not
19 validly hold office in California LULAC.

20 56. Because no valid election was held as stated
21 above, the Executive Board in office during the
22 previous year is still California LULAC's
23 Executive Board.

24 57. California LULAC is entitled to hold an
25 election of the members of the Executive Board
26 that its National Constitution and Bylaws
27 mandate be elected, and to set a date, time and
28 place for such election.

Handwritten notes:
Diaz
Rodriguez
Sandoval
Martinez
Salazar
Mendoza
Ricardo

1 58. The invalidity of the May 23, 2010 election was
2 known, or should have been known, to the
3 Defendants, and the Defendants knew, or should
4 have known, that their actions in holding the
5 election and in thereafter holding themselves
6 as duly elected officers of California LULAC
7 would inevitably result, in California LULAC's
8 having to bring this action and, in that
9 connection, having to incur litigation and
10 other related expenses.

11 59. Since May 23, 2010, in various states of the
12 United States, including the State of
13 California, the Defendants have sought
14 financial contributions and have made public
15 announcements claiming that they are the duly
16 elected officers of California LULAC and have
17 contacted persons and entities that do business
18 with California LULAC.

19 60. Since May 23, 2010, through their claimed but
20 invalid status as officers of California LULAC
21 the Defendants:

22 (a) Have acquired information, knowledge and
23 business opportunities from and through business
24 contacts and connections developed by California
25 LULAC before May 23, 2010;

26 (b) Have acquired information, knowledge and
27 business opportunities from and through business
28 connections and contacts that were rightfully

1 California LULAC's that came about after May 23,
2 2010 in response to the Defendants' representing
3 themselves as officers of California LULAC.

4 (c) Have exploited the information, knowledge and
5 business opportunities heretofore mentioned for
6 their own benefit and for the benefit of an entity
7 or entities created by the Defendants to compete
8 with California LULAC and to benefit from such
9 information, knowledge and business opportunities.

10 (d) Have failed to inform California LULAC of
11 their activities in connection with the
12 information, knowledge and opportunities heretofore
13 mentioned and to the contrary, have willfully
14 refused and failed to furnish any information
15 regarding those activities to California LULAC.

16 61. The damage thus resulting to California LULAC
17 comprises the following:

18 (a) Irreparable damage that will irremediably
19 cripple California LULAC's ability to carry on its
20 business in California and elsewhere and cannot be
21 adequately compensated for in damages unless the
22 Defendants are enjoined from making further claims
23 that they are the duly elected officers of
24 California LULAC and, as such represent California
25 LULAC, from in any other way interfering with the
26 activities of California LULAC and from exploiting
27 and taking advantage of California LULAC's business
28 and other contacts; and

1 (b) Monetary damage resulting from the
2 Defendants' causing California LULAC to lose
3 funding and business opportunities from those
4 persons and entities that have or will extend
5 funding and business to the Defendants and to those
6 entities formed by the Defendants to exploit those
7 opportunities.

8 (c) Monetary damages flowing from the resulting
9 financial inability on the part of California LULAC
10 to carry out its aims and to offer the quality and
11 quantity of training and other activities to its
12 members and to the members of the Hispanic
13 community that would have been offered in the
14 absence of curtailed financial inflow.

15 (d) Loss of good will.

16 (e) Litigation and related expenses.

17 **WHEREFORE, the Plaintiff prays that the Court**
18 **enter judgment against the Defendants, jointly and**
19 **severally, as follows:**

- 20 1. **For judgment for the Plaintiffs and against the**
21 **Defendants and each of them;**
22 2. **For Declaratory Relief as requested and set forth**
23 **in the First and Fourth Causes of Action;**
24 3. **For general damages according to proof on the**
25 **Second and Third Causes of Action;**
26 4. **For a Temporary Restraining Order, Preliminary**
27 **Injunction, and Permanent Injunction on the Fifth**
28 **Cause of Action**

1 (a) restraining the Defendants from claiming that
2 they are officers of California LULAC,

3 (b) from in any way interfering with the business
4 and affairs of California LULAC including
5 contacting persons and entities that do business or
6 that have done business or may hereafter do
7 business with California LULAC, exploiting or
8 taking advantage of California LULAC's business and
9 other contacts, and generally, doing anything that
10 may jeopardize California LULAC's relations and
11 prospects with those persons and entities;

12 (c) award damages against the Defendants and each
13 of them for the losses, expenses and damages that
14 have been caused to California LULAC as a result of
15 the Defendants' activities;

16 (d) order the defendants to disgorge all funds
17 they, and their entities they have created have
18 received from their exploitation of California
19 LULAC's business and other opportunities;

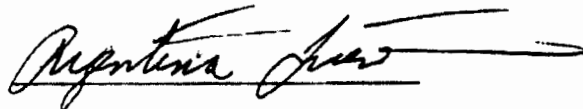
20 (e) Set a date, time and place for the holding of
21 the election of Executive Board members to hold
22 office over the one year period following the
23 election;

24 (f) award costs, interest and attorney's fees and
25 such other relief as may be proper.
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Angel Luevano



Argentina Luevano

Sunday, May 23, 2010 7:56 AM

LULAC Membership Standing**From:** "Luis Vera Jr." <lrvlaw@sbcglobal.net>**To:** "Angel Luevano" <aamentor2000@aol.com>**Cc:** "Brent Wilkes" <bwilkes@lulac.org>, "Carolina Munoz" <cmunoz@lulac.org>, "Guadalupe Morales" <Gmorales@lulac.org>, "Roger Rocha Jr." <rocha_roger@msi.com>, "Rosa Rosales" <presidentrosales@lulac.org>

Re: Angel and Argentina Luevano.
Re: LULAC Members Not in Good Standing
Date: Friday May 21, 1070

This is notice that both of you as Members of LULAC are not in Good Standing and all rights and privileges as members are immediately withdrawn. Therefore you are immediately prohibited from conducting any LULAC business or to use the LULAC name. This action is for the following reasons:

1. Your failure to comply with the boards directive and your promise to repay the thousands of dollars you spent for Puerto Rico charged to the LULAC account.
 2. Placing LULAC in a bad light with our partner hotel by failing to pay your state convention bill for 2009 and by again attempting to use the LULAC National credit account to charge your 2010 convention hotel bill.
- The business office is immediately instructed to not make any expenditures of any kind for each of you in regards to reimbursement or travel and expenses of any kind including the upcoming national convention. The membership office is instructed to not accept you as a member in good standing nor to recognize you as officers in LULAC nor to accept you as delegates. This directive will remain in effect until such time as you repay the full balance of your monetary debt to LULAC and debt caused by you in regards to your past and present state convention hotel bills.

Respectfully,

Luis Roberto Vera, Jr.

Attorney and Counselor at Law

LULAC National General Counsel

1325 Riverview Towers

111 Soledad

San Antonio, Texas 78205-2260

Office (210) 225-3300

Fax (210) 225-2060

lrvlaw@sbcglobal.net

Jan B. Tucker with.....



FBI Director Louis Freeh



Atty Gen Janet Reno



Labor Sty Hilda Solis



President Bill Clinton

For I.D. Only:

Chairman of the
Board of
Directors -
California
Association of
Licensed
Investigators

National
Commissioner
for Civil Rights,
LULAC

Chief
Investigator,
Civil Rights
Commission,
CA League of
United Latin
American
Citizens

Legislative
Director - L.A.
County
Criminal
Defense
Investigators
Association

Member -
National
Council of
Security &
Investigative
Services

Member -
American
Correctional
Association

J.B. TUCKER & ASSOCIATES

P.O. Box 433 Torrance CA 90508-0433 310.618.9596 Fax 1950

California Private Investigator License #PI-10143

Email: admin@janbtucker.com www.janbtucker.com

June 1, 2010

Re: REQUEST FOR PARLIAMENTARY RULING CONCERNING VALIDITY OF CALIFORNIA
LULAC ELECTION HELD May 23, 2010

To: All Concerned Parties

I served as the convention parliamentarian for the California LULAC State Convention held on May 23, 2010. In that capacity, I have been asked for an *ex post facto* ruling on the validity of those elections in light of documents which were subsequently obtained and provided to me that bear directly on the legitimacy of votes cast by delegates. The facts have been recounted to me by Al Rocha, as follows:

Re: INVALID 2010 CALIFORNIA LULAC STATE CONVENTION ELECTIONS

The League of United Latin American Citizens (LULAC) Constitution, Bylaws, and Protocol (Revised 2008) Article XIV, The Constitution and Bylaws, Section I, states that "This Constitution and bylaws shall become the Supreme Law of the League of United Latin American Citizens (LULAC)."

In addition, the subject Constitution and bylaws identifies the required processes to elect its National and State Officers and Directors. Specifically, the LULAC Constitution and Bylaws states the following:

1. "Only accredited delegates registered at the Convention will be allowed to vote."
2. "Each council in good standing shall have the right to send as many delegates and alternates as it is entitled to in accordance with their paid membership."
3. "Any delegate that is uncertified shall not be allowed to vote."

4. "Councils organized less than thirty days prior to a convention or whose charter has not been officially presented and approved by the National Board of Director, may send delegations to a convention but without the right to vote."

5. "Certified delegates of the Council shall have a vote."

6. "Charter agreement states that a Council shall have all the rights and powers and will be bound by the limitations and responsibilities as set forth in the LULAC Constitution and Bylaws and this Agreement. This Agreement becomes a binding contract upon its execution by the contracting parties effective on the date stated above and is renewable annually."

7. "The Constitution and Bylaws shall become the Supreme Law of the League of LULAC. All Constitutional provisions, Bylaws, Resolutions, Policies and Customs in conflict with this Constitution and Bylaws are hereby repealed and/or rescinded."

8. "The State Assembly is vested with all legislative, judicial and executive powers granted under its constitution and bylaws, adopted resolutions and policies which shall be subordinate to and consistent with the National Constitution an bylaws, and the resolutions, policies and customs of the National Organization."

9. "State Directors are elected by their respective State Assemblies, shall be elected by a majority vote of the accredited delegates."

10. "Credentials Committee will be used to ascertain eligibility to vote at the convention."

11. "Any delegate that is uncertified shall not be allowed to vote. Such a provision may not be set aside by the Assembly."

On Sunday, May 23, 2010, the California State Assembly allowed 119 delegates to take part in the convention elections contrary to the recommendations of eligibility determinations from the California State Treasurer, the Credentials Committee, and Elections Committee Chairman. Please review the following documents:

1. 2010 National LULAC Council Roster for California
2. 2010 California LULAC Roster – Districts and Councils
3. 2010 California LULAC Credentials Committee Report

The listed reports will identify numerous councils and individuals who were listed as not eligible and uncertified to vote in the subject elections. Further, please note that Miguel (Mike0 Gonzales, District 3 Director, put a 'Stop Payment' on his \$800.00 check on May 24, 2010 that was used to pay the delegate fees for 40 delegates at the Convention on Sunday, May 23, 2010. His

check was used to pay for the participation of Councils 5154, 3155, 3156, 3157, and two councils without charter numbers. His check and the related bank notice is attached for your review as well.

As the appointed State Parliamentarian, I asking you to review the attached documents, to review the LUALC Constitution, Bylaws, and Protocol (Revised 2008) and to offer a professional opinion on the validity of the elections held on Sunday 23, 2010 at California LULAC Convention in Anaheim, California at the Doubletree Hotel Anaheim.

I appreciate your assistance and professionalism.

Alberto (Al) Rocha
Deputy State Director
510-809-5381

Having reviewed the *prima facie* evidence of the Stop Payment on a Check tendered for delegate fees from a corporation, Santa Ana Security Services, Inc. which was presented for payment of those fees on May 22, 2010 and signed by Miguel Gonzalez it is intuitively obvious that the delegates permitted voting privileges at the conference dependent on that payment were in fact not eligible to vote.

In reviewing these issues, I have consulted *Roberts Rules of Order, Newly Revised* (Cambridge MA: Da Capo Press, October 2000, 10th Edition) pp. 402-404; and *The Standard Code of Parliamentary Procedure*, (New York: McGraw Hill, 2001) p. 161. The Standard Code is otherwise known as "Sturgis," for its author, to distinguish it from "Roberts." Sturgis is the code utilized by the American Institute of Parliamentarians.

Rule 12 of the LULAC State Convention Rules which were adopted by the convention provides that "Challenges to any election must be issued to the Legal Advisor immediately after the outcome is announced and before another election has begun. It shall take, as per Robert's Rules of Order (revised), a two-thirds vote to overturn all rulings made by the Legal Advisor." This rule however does not take into account a situation in which the status of ineligible delegates is not discovered until after the election. Therefore, the 17th rule comes into play. That rule states that "Any issue not covered by these Convention Rules will be determined by the proper provisions within the LULAC National Constitution, By-Laws and Protocol, and Robert's Rules of Order (revised) in that order.

The Constitution, Bylaws and the League's "Simplified Parliamentary Procedure," Article V, simply do not address the issue of what to do about an election in which the ineligibility of delegates is determined after the fact.

Robert's (p. 402) states that "If there is evidence that any unidentifiable ballots were cast by persons not entitled to vote, and if there is any possibility that such ballots

might affect the result, the entire ballot vote is null and void and a new ballot vote must be taken." *Sturgis* (p. 161) indicates that "An election may be challenged only during the time when it is taking place or within a reasonably brief time thereafter..." and recognizes that ineligible voters having participated is a ground for challenging an election. *Sturgis*, like *Robert's*, agrees that to be effective the number of challenged votes must be such that a different result might have occurred had the ineligible voters not participated. This standard is also borne out by similar provisions of the California Elections Code.

I therefore rule as follows:

1. All delegates whose legitimacy depended upon the payment of delegate fees that were paid with the check whose payment was stopped were not eligible to vote at the convention in spite of their having been seated and allowed to participate in the voting;
2. The challenge to this election is within a reasonably brief time and could only have been made following discovery of the "stop payment" placed on the delegate registration check;
3. The number of delegates involved is sufficient to have changed the outcomes of various elections, beginning with the election for State Director;
4. Because the outcome of each office is dependent on decisions made on the floor by potential candidates based upon the votes for offices that have been concluded, the ineligible delegates have changed the entire equation of the election;
5. The election for officers that took place on May 23, 2010 is thus, "null and void," to use *Robert's* terminology, and "...a new vote must be taken."

Respectfully submitted,



Jan B. Tucker
2010 State Convention Parliamentarian
California League of United Latin American Citizens

EXHIBIT 12

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Voice of the Mainland

Thursday, October 14, 2010

LULAC WAS REINSTATED ON OCTOBER 14, 2010

The League of United Latin American Citizens has managed to be reinstated as a viable nonprofit corporation effective October 14, 2010. LULAC's charter was placed in forfeiture on December 1, 2004 and was involuntarily dissolved on April 8, 2005.

The organization's new agent for service is Luis R. Vera at 111 Soledad, Suite 1325, San Antonio, Texas 78205.


The organization apparently filed reports that had not been filed for 2004, 2005, 2006, 2007, 2008, 2009 and 2010 on the date of reinstatement.

The dates of lacking legal status to conduct business are December 1, 2004 through October 13, 2010.

Whether the dead time is challengeable for acts undertaken in the name of the organization during the dead period would be up to a court to determine.

We will just have to wait and see where LULAC goes with its new life.

At the present time, it is kicking members out of the organization and mailing out cease and desist letters to LULAC'ers it considers enemies of the organization, like the letter that went out to the Luevanos and the letters that are being prepared for Jaime Martinez, David Cruz and the Editor. You will note that the Luevano letter is dated October 8, 2010, 5 days before LULAC had been reinstated. In the Editor's eyes, the cease and desist letter is challengeable because it was written during the dead time, a time that LULAC could not conduct business for acts that occurred during the dead time.

Posted by Editor at 8:38 PM 0 comments 

Wednesday, October 13, 2010

LULAC: THE ARROGANCE

You might want to read the letter below before you read the Editor critique of the letter.

Read the letter that was written by Attorney Xavier R. Baeza out of San Francisco, California to Angel and Argentina Luevano. Read it carefully and absorb the arrogance of an attorney who does not understand the law of organizations in Texas representing an organization that has lost the hinges on its doors.

The attack on the Luevanos is Pinochet. He should have checked with a corporation attorney in Texas to learn that LULAC is a dissolved organization. As a dissolved organization, LULAC has no legal standing. LULAC cannot take the Luevanos to court. All acts of the attorney against the Luevanos are illegal acts of the attorney for which he can be held liable. If he is acting for someone in LULAC, those persons who sanctioned his acts are engaged in illegal acts for which they can be held liable.

He warns the Luevanos that they cannot hold themselves out as former officers of LULAC. In the Editor's books they are still officers of the organization. If you are a former office holder, you have license to hold yourself out as a former office holder. As close as President Richard Nixon was to getting impeached, we still refer to him as the former President. For many millions he still has the title of Mr. President.

000010-L1

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LULAC WAS REINSTATED ON
OCTOBER 14, 2010

LULAC: THE ARROGANCE

LULAC: At THE CROSSROADS

LUEVANOS WIN ROUND ONE
AGAINST LULACLUEVANOS RESPONSE TO
ANOTHER KANGAROO
COURT CONDUCT...TIME THAT LULAC HAS BEEN
WITHOUT A CORPORATE
CHART...YOU ARE HEREBY NOTIFIED
THAT THE CORPORATION'S
RIG...NO EXCITEMENT TO GET OUT
THE VOTE IN
2010...HERE'S...Banana Republic: F.B.I.
Arrests 129 in Police
Corr...Proposed Changes to the
Constitution of LULAC
Rega...

LULAC UPDATE

LULAC: RIGHT TO CONDUCT
AFFAIRS WAS FORFEITED.
Dec...

He warns them that when speaking to a "child" or an adult, that any reference that the Luevanos make that involves LULAC, that each must condition the comment with a statement that each is not a person in good standing in LULAC. How KKK can LULAC get? How Pinochet can LULAC get? Is this what LULAC has learned from the government of Puerto Rico? The year is 2010 in California, not some backcountry town in somewhere Mississippi, Louisiana, or Alabama in the year 1951.

► September (13)

► August (3)

Where did LULAC find this stupid attorney, this pendejo abogado?

Attorney Baeza warns the Luevanos not to use the word LULAC, L.U.L.A.C., or similar words that include the LULAC name, in the short term or in the long term. LULAC'ers use LULAC in every other word. Sometimes its good, sometimes its bad, but they still use it all over the map. Se avento LULAC. Que pinche LULAC. Que bruto LULAC, Que padre LULAC. Que lindo LULAC.... El chavo esta en LULAC. La chava esta en LULAC. They're LULAC'ers....they're good people.

The Luevanos are warned that they are not to make any statements that they are current members of LULAC or former members of LULAC. Even divorced couples refer to each other as my former wife, my former husband or I'm a former wife or former husband of the person.

Attorney Baeza goes on to threaten the Luevanos that if they cross the many lines the attorney Baeza draws in the sand, that he will take the Luevanos to court and the matter to the Elections Department of the County Clerk's office and go to the press. Mr. Luevano is running for a state office in California. What is LULAC doing getting involved in state politics in California? Its a nonprofit corporation with a 501 (c)(3) charter. No politics.

If you are part of LULAC, this is what you will be dealing with for some time to come. LULAC has gone Banana Republic and Pinochet at the same time. The progressive wing of LULAC is going to fight back will all the energy that life will allow. Just wait and see. We're turning the temperature up to 500 degrees. We're going to turn the heat all the way to the top. We will leave it there until someone shows some respect.

Similar letters from LULAC's hired guns are on their way to Jaime Martinez, David Cruz and the Editor.

The Editor would like a letter like the one written to the Luevanos from the same stupid Attorney Baeza. The Editor would cut this stupid attorney down to size in a Texas, aka, New York, minute.

By the way Attorney Xavier R. Baeza, there is no Friday, October 14, 2010. This Friday will be October 15, 2010. Next time you draw your gun, make sure its pointed in the right direction. You might get yourself shot in the foot.

Re-write your stupid letter to the Luevanos. Apologize to them for being a stupid mean person. Ask them for their forgiveness. Next, apologize to all LULAC'ers whom you have offended with your stupid letter. If you still insist, correct the date. If you are a manly attorney, you will follow up on your threat. If you are a girlie attorney, which I think you are, you will realize you have made a huge mistake and not take any action against the Luevanos. As of the date of your letter, LULAC is a dissolved nonprofit corporation under the laws of the great State of Texas. If you act on your threats, the Luevanos and their attorneys will get your lawsuit thrown out of court in rapid fire order.

While you are correcting your letter, get the name of Rosa correct. Her name is Rosa Rosales, not Rosa Sandoval.

By the way, does LULAC national pay you by the hour for writing smart letters or by the hour for writing venomous letters?

In all, the letter is cruel, as cruel as the Editor has seen.

Something that you might expect from the KKK writing to a black person in 1951 Mississippi, Louisiana, of Alabama.

Is this what LULAC has come to?

The Editor is anxious to read the letter to Jaime, to David and the one to himself.

Oooh. LULAC is getting pissed off

Get mean and tough and LULAC will get pushback.

This is the posting as of 12:01 AM CST, Thursday, October 14, 2010 on the Texas Secretary of State's website:

5967901	THE LEAGUE OF UNITED LATIN AMERICAN CITIZENS	Domestic Corporation	Nonprofit	Involuntarily dissolved	Legal Inactive
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You may print the letters below by clicking the printer icon that appears on each page.

Law Offices Of
Xavier R. Beza
15 Boardman Pl., 3rd Fl.
San Francisco, California 94105

Tel: (415) 252-9796
Fax: (415) 252-9772
Cell: (415) 260-6112

October 8, 2010

CA Bar #131552
AZ Bar #023337

Mr. Angel Luviano
Mrs. Argueta Davila-Luviano
3001 Kodak Street, Apartment 129
Antioch CA 94531

Sir/ Madam,

On behalf of the Board of the National Office of League of United Latin American Citizens, I am sending you this letter to demand that you cease and desist from using the name of League of United Latin American Citizens or its acronym of L.U.L.A.C. and/ or any of the possible variations in any and all forms of communications, which include oral/ verbal communications and are not limited to written, telegraphic, and or digital forms of communications.

Furthermore, you cannot individually nor collectively refer to yourselves as members of the above-named organization, either past or present. If you do make this representation, to anyone, adult or child, you must state that you are members not in good standing. Your own admission that you had a deal with Rene Sandoval acknowledges that you know that you were not in good standing and that you were trying to raise money in order to resolve the issue of monies that had been taken by you, individually and collectively.

Since you know that you were not in good standing and have not been in good standing for some time, you are not eligible to hold office in said organization. Therefore, you cannot hold yourselves out to be officers in said organization. You must cease and desist from identifying yourselves as officers and past officers.

This demand applies to all forms of communications including but not limited to websites and any other form of communications. Failure to remove your assertions from any website or other form of communication that you may participate in or submit information to will lead to further requests such as injunctions filed in your home county of Contra Costa County.

You have until 12pm (noon) on Friday, October 14, 2010, to comply with this cease and desist demand. My office has been authorized to inform the Elections Dept. of the County Clerk if you do not comply with this demand. And the press will be informed as well.

If you fail to comply with the demands indicated in this letter a request for a preliminary injunction will be filed on Friday, October 14, 2010 after 12pm. You may contact me at the contact information listed above. This Fax number has changed to (415) 864-3389. I do not accept collect telephone calls. I will not speak about your matter with anyone who is not an attorney duly licensed to practice law in the State of California and if the person is an attorney, they must provide proof that they are retained to represent you.

Submitted

Xavier R. Basso
Attorney at Law

PS: I have read your laughable response to the National Board's impeachment process and must inform you, that since you had knowledge that you were not in good standing, you, individually and collectively, are not officers nor directors in LULAC.

Posted by Editor at 11:59 PM 0 comments

LULAC: At THE CROSSROADS

The League of United Latin American Citizens was born out of a merger of three Mexican American organizations that had been trying to come together as early as 1927. The organizations were the Order of the Sons of America out of Corpus Christi, Texas, the Order of the Knights of America out of San Antonio, Texas and the League of Latin American Citizens out of the Texas Valley. The first convention was held in Corpus Christi on May 18-19, 1929. This convention was called a constitutional convention where the constitution of the organization would be ratified. The second convention was held in Alice, Texas on May 3-4, 1930. It was out of this second convention that LULAC voted to incorporate under the laws of the State of Texas. The incorporating fee was \$10.00. The corporate charter for LULAC was filed on June 15, 1931. The charter number assigned to LULAC by the Texas Secretary of State was Charter Number 59679. The Secretary of State has added an appendage of 01 to the number. The organization's Charter Number today is known as 5967901. You may review the original charter here: http://voiceofthemainland.com/LULAC_Corporate_Document_1.pdf

The original filing has page 3 missing

The charter for each of the three organizations that merged to create LULAC were filed in 1922 (Sons of

Voice of the Mainland

Tuesday, October 12, 2010

LUEVANOS WIN ROUND ONE AGAINST LULAC

Below you will find documents related to the case of Angel Luevano and Argentina Luevano and LULAC. Angel Luevano is the LULAC VP for the Far West and Argentina Luevano is the LULAC State Director for LULAC. The LULAC California State Convention was to hold elections for office on May 23, 2010 in the County of Orange, State of California. On the morning of the 23rd of May, Luis Vera, who acts as the legal adviser and legal counsel for national LULAC emailed a notice to the Luevanos informing them that "both of you as Members of LULAC are not in Good Standing and all rights and privileges as members are withdrawn. Therefore you are immediately prohibited from conducting any LULAC business or to use the LULAC name." The emails had been prepared on the 21st of May, but were not sent to the Luevanos until the morning of the 23rd of May. Other LULAC California members received copies of the email along with the Luevanos. You may review the email from Luis Vera here:

http://voiceofthemainland.com/Luevano_Lawsuit_email.pdf

The elections were held in California. The Luevanos filed their lawsuit against Luis Vera, several other California LULAC persons and national LULAC.

The lawsuit may be viewed here:

http://voiceofthemainland.com/Luevano_Lawsuit.pdf

On June 6, 2010, Angel Luevano, as Vice President of the Far West for National Lulac, wrote a letter to Rosa Rosales informing her that the election of officers of the California LULAC Convention were null and void.

You may review the letter from Luevano to Rosales here:

http://voiceofthemainland.com/Luevano_Invalid2010CALULACElectionsLNVP662010.pdf

The analysis is based on an expo-facto analysis of the election written on June 6, 2010 by Attorney Jan B. Tucker, 2010 State Parliamentarian for the California League of United Latin American Citizens.

You may review the Parliamentarian's report here:

http://voiceofthemainland.com/Luevano_Parliamentary_Ruling1PDF.pdf

The Luevanos filed their complaints to National LULAC, which were heard on October 2, 2010. The case of the Luevanos was given a less than 5 minute hearing by the LULAC board, said hearing being conducted by Miguel Escobar, an attorney from San Antonio who has been hired as legal adviser to national LULAC. When Angel Luevano tried to have one of his witnesses testify, Dr. Alberto Rocha, Escobar hung up the telephone and cut of the conversation. Angel Luevano filed the letter below in response to how his hearing had been handled.

Review the Luevano response to the national LULAC board hearing of his case here:

http://voiceofthemainland.com/Luevano_Response_to_Board_10_2_2010.pdf

The Luevanos lawsuit was granted a default judgment against Luis Vera, Benny Diaz and Ricardo Mendoza. A default judgment is a victory for the Luevanos against these three parties.

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LUEVANOS WIN ROUND ONE
AGAINST LULAC

LUEVANOS RESPONSE TO
ANOTHER KANGAROO
COURT CONDUCT...

TIME THAT LULAC HAS BEEN
WITHOUT A CORPORATE
CHART...

YOU ARE HEREBY NOTIFIED
THAT THE CORPORATION'S
RIG...

NO EXCITEMENT TO GET OUT
THE VOTE IN
2010...HERE'S...

Banana Republic: F.B.I.
Arrests 129 in Police
Corr...

Proposed Changes to the
Constitution of LULAC
Rega...

LULAC UPDATE


LULAC: RIGHT TO CONDUCT
AFFAIRS WAS FORFEITED.
Dec...

► September (13)

► August (3)

You may review the default judgment document here:

http://voiceofthemainland.com/Luevano_DefaultGranted10-4-10.pdf

Posted by Editor at 10:59 PM 0 comments 

Sunday, October 10, 2010

LUEVANOS RESPONSE TO ANOTHER KANGAROO COURT CONDUCTED BY LULAC'S ATTORNEY, MANUEL ESCOBAR

It seems like the illegal LULAC Board conducted several kangaroo courts on Saturday, October 2, 2010. The kangaroo courts were conducted by LULAC new legal adviser, Manuel Escobar out of San Antonio. The first LULAC'er to go before the kangaroo Board was the Editor. Stupid Manuel Escobar would not let the Editor's attorney present his case before the Board.

Next came LULAC'er Hector Carrillo. The dumb LULAC attorney gave Carrillo 1 minute to present his case. Without much ado, Escobar hung up the telephone on Carrillo.

Next came the case of the Luevano's out of California. Luevano was given 5 minutes to present his case. When Luevano tried to present Dr. Alberto Rocha as a witness, again the stupid attorney hung up the telephone on the Luevanos. Read the letters the Luevanos sent LULAC in response to the kangaroo court.

We are just letting the illegal LULAC Board take out more of the rope and then we are going to yank it just right to cause the Board to collapse. Just wait and see.

You may block print the letter below or download a pdf file of the letter here:

http://voiceofthemainland.com/Luevano_Response_to_Board_10_2_2010.pdf